

does not routinely employ special operating procedures to decrease impacts on noise sensitive areas. Current use of the Volk West and Volk South MOA's result in avoidable impacts to wildlife. Recommended operating procedures have not been followed (See comments and references in Section 4.8.1.3).

36

2-19/ section 2.5 Calculation of cumulative impacts did not include the Volk West MOA. The Volk West MOA is over three designated state-managed wildlife areas. Cumulative impacts cannot be adequately addressed unless the impacts associated with this MOA are included in the DEIS.

37

2-20/ Table 2-6 Note 4 of this table (and Table S-2 in executive summary) is confusing. How is this total of 4992 derived? What levels were the airspaces assessed at last time they were assessed?

38

2-22/ top To say assessed sorties will not pose a significant variation from historical levels is not accurate. Tables 2-2, 2-3, and 2-4 show 30%, 20%, and 264% increase in sorties in Falls 1 MOA, Falls 2 MOA, and Volk South MOA, respectively. The total increase is 68% of all sorties in these MOA's. Given its centrally located position between these MOA's, why is it that Volk West MOA utilization is not being proposed for increase, as this would seem a logical low level training pathway between other MOA's and Hardwood Range?

39

2-22/ 5 As mentioned in our general comments, the DEIS needs to better describe what actions the military takes when planned parameters for airspace are exceeded. This paragraph states that the military manages the airspace to ensure no exceedances but is mute on what happens when one occurs.

40

2-24/ 4 A monthly utilization breakdown should be provided to determine expected worst-case noise generation periods and help plan possible seasonal mitigation strategies at sensitive receptors.

41

2-25/ 3 The worst-case noise impact in Falls 1 MOA is described as being located along certain segments of VR-1616 for an average of less than seven and one-half minutes per day. What are the worst case scenarios for R-6904 and other MOA's? How much additional time of worst-case noise along these routes would be required before the SEL would exceed 65 dB?

42

2-26/ Table 2-8 This table should be expanded to show the reason why the proposed action would result in a higher or lower change in dB (more sorties, fewer sorties, other?) for each receptor listed.

43

2-27/ Are these noises only from jet engines? The aircraft munitions use (i.e., guns and cannons) may be the loudest and most sudden noise that occurs and should be included. The last paragraph (running onto page 2-28, mentions the "construction period". Would the construction period be restricted to daylight hours only, in consideration of noise effects to nearby residents? (This question also applies to 4-11/ 1.)

44

2-27/ 2 There will be occasional individual noise levels exceeding 130 dB which are significant. Individual events may cause human annoyance, but average noise over the course of the day will not exceed high annoyance levels (i.e., above 65 dB) on a continuous basis.

45

2-28/ section 2.6.1.3 The frequency of Class A mishaps is projected at 20.9 years for Falls 1 MOA. It should be noted that Falls 1 MOA conservatively covers less than one-fifth of Hardwood Range and

46

RESPONSES TO COMMENTS

Response to Comment No. 36

Comments for Subsection 4.17 express concern over bird avoidance. Because of the potential for loss of a pilot's life and the high cost of modern military aircraft, avoidance of collisions with birds is extremely important to the ANG. The potential for a bird-aircraft strike would not change significantly under this proposal. Training associated with the proposal will continue to encompass the same seasonally adjusted bird avoidance procedures associated with bird migration corridors as are utilized currently with the existing airspace. Due to the fact that bird strikes are rare in existing airspace associated with the Hardwood Range, the likelihood of future bird-aircraft strikes under any of the alternatives would be expected to be low.

The USAF has established a Bird/Aircraft Strike Hazard (BASH) Team to implement procedures to prevent and reduce the threat of bird/aircraft strikes, and to investigate and track any bird strikes that occur. In addition, each USAF/ANG base or flying unit is required to establish a BASH program to minimize the risk of bird strikes both at the base airfield and in airspace training routes for the unit. The USAF BASH Team assists each base or flying unit by providing Bird Avoidance Model (BAM) graphs. These graphs estimate the relative bird strike risk for flying along a specific low-level route or operations area. The model is developed on the basis of waterfowl and raptor migration and concentration data. The BAM graph depicts the severity of the bird strike hazard at a particular time of day, month, and segment of a low-level route. This information is used by the flying unit to determine the optimum route schedule and avoidance measures to be taken to prevent bird/aircraft strikes. In addition, the unit publishes Notices to Airmen (NOTAM) to alert transient aircrews to specific bird migration hazards, activity periods, and avoidance procedures.

Response to Comment No. 37

Flight activities in the Volk West MOA are unaffected by these proposals. The environmental effects of these activities were previously assessed under other environmental documentation (ANGRC 1992). However, the cumulative effects associated with two MTRs (VR-1616 and VR-1650) passing through the MOA airspace were considered. Resultant noise directly along the centerline of these two MTRs is not significant, and varies only slightly from the MTR-related contribution. The analysis indicates that cumulative noise levels are an Ldnmr 58 and 48 under VR-1616 and VR-1650, respectively.

RESPONSES TO COMMENTS**Response to Comment No. 38**

The restricted area referred to in Note 4 was previously assessed when conversions of aircraft at Des Moines, IA and Madison, WI were proposed. This number reflected the best estimate at that time for the restricted area usage. Falls 1, Falls 2, and Volk South MOAs were previously assessed for 435, 200 and 185 sorties per year, respectively.

Response to Comment No. 39

See response to Comment No. 28.

Response to Comment No. 40

See response to Comment No. 8.

Response to Comment No. 41

The procedures used to determine aircraft noise exposure and its results represent the best available technology. All aircraft operations presently occurring, and proposed to occur were considered. Noise was computed using the Air Force's MR NMAP software, which bases its calculations on the same physical principles used for aircraft noise analysis throughout the world, and was specifically validated for military airspace operations. Data incorporated into the Air Force's noise models are widely accepted by the scientific community, and the Air Force regularly participates in various scientific organizations to ensure that the best available data and methods are used.

The noise impacts described, and the means by which they were assessed, are explained in more detail in Subsection 4.2.1.4. Estimated exposures to elevated sound would range from approximately 1.5 minutes per day in the Volk South MOA, to the indicated approximate 7.5 minutes per day in the Falls 1 MOA directly under VR-1616, Segments E-G. Since the Sound Exposure Level (SEL) metric normalizes all of the acoustic energy generated during a noise event to a one-second time frame, time has no relevance in that metric's calculation.

Levels of aircraft operations (sorties) are shown in Subsection 2.2.2. Additionally, a more detailed listing of sorties by specific aircraft type may be found in Subsections 3.3 and 4.3. These specific aircraft, and their numbers of operations, formed the basis for all quantitative analyses presented in the noise, safety, and air quality sections of the EIS.

Noise modeling included all aircraft using the range, performing all anticipated maneuvers. Therefore, defined strafing and bombing tracks were identified and described whenever possible, and applicable numbers of aircraft were assigned to those tracks. However, noise modeling is limited to aircraft noise (i.e., noise from the engine and aerodynamic noise associated with the aircraft's passage through the air). There are no approved models to assess the noise resulting from the airborne firing of 20 mm and 30mm ammunition. In regard to training ordnance, the gunpowder used in the spotting charges is approximately equivalent to that contained in one 10 gauge shotgun shell. Since the charge is contained in the housing of the training ordnance, any noise resulting from its detonation is considered insignificant.

Response to Comment No. 45

The analysis accomplished for this EIS does not indicate that noise levels would exceed 130 dBA.

associated air space, not counting low level training routes or non-low level routes from unit bases throughout the Midwest. We would expect the frequency of Class A mishaps associated with Hardwood Range use, including travel to and from the range or low level exercises in MOA's/MRT's, to be much more frequent. A complete list of all Class A mishaps for the last twenty years covering Hardwood Range utilization, MOA's, MTR's, and non-low level access routes to Hardwood Range should be provided. Since increased utilization is proposed and since safety may be jeopardized due to increased reliance on reserve units (as opposed to active units), it should be noted that potential for Class A mishaps will increase.

2-28/ last The conclusion of no adverse impact does not seem to fit with the existence of polluted groundwater in part of the existing range, as acknowledged in other parts of this EIS. The history of batteries and fuel in target vehicles and old fuel tanks warrants further sampling of soils and groundwater in the existing range's target areas for possible contamination. Also, the DEIS doesn't mention how or whether these problems will be prevented in the expansion area.

2-29/ 1 With the abundance of wetlands and the high water table, contamination of ground water from an aircraft crash could be quite likely. Upland areas have sandy soils which could allow rapid infiltration of contaminants to groundwater.

2-29/ 4 Define water recreation resources. There is at least some risk to water resources from: physical disturbance to surface waters within the Hardwood Range drop zone and potential for sediment discharge migration off-site; surface water or groundwater pollution at Hardwood Range due to hazardous material release from destroyed targets (vehicle oil, gas, battery lead, etc.), from aircraft crashes or from ordnance (i.e., signal cartridges).

2/29/5 Filling of wetlands for construction purposes will have greater impact than just "vegetation loss."

2-30/ Section 2.6.1.7 See comments under section 4.7.

2-30/ Section 2.6.1.8 Refer to comments on Section 4.8. The statement of "...no adverse impacts on wildlife, livestock or vegetation." seems to be contradicted on page 2-31, paragraph 1, sentence 1. Studies described in section 4.8 indicate impacts are unknown. Further, since utilization increases are proposed, and threshold levels at which wildlife impacts from noise may be significant are largely unknown (contrary to top of page 2-31), all conclusions that impacts are insignificant are unsubstantiated. There will be adverse impacts to vegetation and wildlife. Nowhere in the document is there information on the impacts of the current range on biological resources for use as comparison to what the expected impacts from expansion might be.

Resident species may be able to adapt, but this area attracts migratory birds that are less accustomed to this type of noise. These sensitive areas are temporary resting sites that provide safety, comfort, and food for migratory birds. Migratory birds pass from one geographic region to another and may not stay long enough to become accustomed to noise. In addition, other studies show that wildlife and domestic animals are more vulnerable to disturbances like low-level flights during critical time periods such as nesting, birthing, rearing, staging and migration.

2-30/2 See general comments about lack of adequate field work. This paragraph says that species

RESPONSES TO COMMENTS

Response to Comment No. 46

A complete discussion of Class A mishap rates is contained in Subsection 3.3.3.1 of the EIS. Tabulation of statistical projections for Class A mishaps for each aircraft using the airspace associated with this proposal is presented in Subsections 3.3.3.1 and 4.3.3 for current and proposed use conditions, respectively.

Response to Comment No. 47

Soil and water testing has been conducted as part of the IRP for Hardwood Range. Only one IRP site, an ammunition burial site, is located on the range. A feasibility plan for this site was produced in March of 1998. Other sources of contamination include USTs. All USTs have been pulled and closed by Wisconsin DNR. Batteries and fuel in vehicles are removed prior to their becoming a target. Batteries are disposed of as a hazardous waste by a private contractor. The range also employs a private contractor to recycle the fuel, used oil and antifreeze. Potential target vehicles for the proposed range expansion would be "demilitarized" prior to being used as a target.

Response to Comment No. 48

Background information discussing the geology and physiography of the area is provided in Subsection 3.5.1.1. This Subsection describes effects from the historic occurrence of the glacial lake, Lake Wisconsin, on the soils and geology of the area. Descriptions of groundwater resources in the area and baseline water quality are provided in Subsection 3.6.1.2. As discussed, the elevation of the shallow aquifer often raises above the ground surface level during periods of high precipitation, demonstrating that strong relationships exist between surface water and groundwater. Potential sources of pollutants to surface and groundwater in the range expansion area are from aircraft mishaps (i.e. crashes) and from munitions. These sources and the fate of potential pollutants are discussed in Subsection 3.3.3.1 (Aircraft Mishaps), Subsection 3.3.4.1 (Munitions Use and Handling), and Subsection 3.4.1 (Hazardous Materials and Solid Waste). Potential impacts to both surface and groundwater resources and water quality are discussed in Subsections 4.6.2.1, 4.6.2.2 and 4.6.2.3. Based on the information provided in Section 3, adverse impacts to surface and groundwater quality or drinking water supplies would not be expected. Subsection 4.5.2.3 (Water Quality) was modified to reference the identified appropriate sections in Section 3 and discuss conclusions regarding groundwater quality.

RESPONSES TO COMMENTS

Response to Comment No. 49

See response to Comment No. 47. EOD removes unspent ordnance on the range on an annual basis. Various testing on site has not identified any chemicals found in the ordnance in water or soil.

Response to Comment No. 50

The discussion of Water Resources (Subsection 2.6.1.6) is a summary of potential impacts. The more detailed discussion of impacts to wetlands is presented in Subsection 4.6.2.4.

The ANG firmly commits to not impact wetlands in development of the proposed expansion area; however, Executive Order 11990 which calls for "no net loss of wetlands" does not preclude the development of projects within a wetland as long as no practicable alternatives exist and that the proposal includes all practicable measures to avoid wetlands impacts. Assuming the expansion is approved, the proponent would be required to obtain an individual Clean Water Act Section 404 permit for any activities occurring within wetlands or other waters of the United States. Issuance of a Section 404 permit requires a demonstration that the Section 404 (b)(1) Guidelines have been followed. The Guidelines require that the project avoids and minimizes impacts to wetlands to the extent possible and provide mitigation for unavoidable impacts. Once specific designs and locations for the landing zone, drop zone, and target area(s) are available, the ANG will conduct jurisdictional wetland delineations to facilitate the assessment of specific project components (and alternatives) on wetland resources, as applicable. Subsection 4.6.2.4 of the EIS discusses requirements under Executive Order 11990, Protection of Wetlands, Section 404 of the Clean Water Act, and Chapter NR 299 of the Wisconsin Administrative Code.

Response to Comment No. 51

The best available information indicates that the effects of aircraft overflights on wildlife and livestock are generally short-term and minor, with no mechanism for long-term effects such as reduced reproduction, increased mortality, or habitat abandonment. Noise impact studies from a variety of military use areas were considered in the impact analysis process. Refer to Subsection 4.8.1.3 of this EIS for further discussion of noise impacts to wildlife.

Response to Comment No. 52

Comment noted (see Section 6 in Volume 1 concerning incorporation of public comments).

"are very likely to occur." The EIS conclusions should be based on actual field work site at specific proposed construction sites.

2-32/ 3 It is not accurate to say that access to recreational lands "may be periodically affected." Such access will be essentially prohibited most of the year due to safety concerns.

2-32/ 6 The statement that recreational and forestry uses of the expansion area will not be impacted is not substantiated considering the impacts to these land uses experienced at the current range. Impacts to *major* transportation would not be affected, however local transportation would be affected (13 miles of public road to be closed per page 4-68).

2-33/ 1 Increased utilization of the MOA's will result in a greater impact on visual resources and aesthetics. Restrictions to flight activities over visually sensitive areas like Wildlife Areas is not adequate and will result in an alteration of the visual environment. The conclusions regarding Necedah Wildlife Refuge and Wood County Wildlife Area ignore adverse impacts to waterfowl reported in the past at Necedah and also Sandhill Wildlife Area.

2-33/ Section 2.6.1.12 Our letter of August 20, 1997, to Kevin Marek provided comments on the socio-economic impacts included in the DEIS in Section 4.12. As discussed in several places in this letter and the previous letter, we are concerned that the DEIS does not address socio-economic impacts associated with the replacement of county forest lands in Wood County if the proposed action occurs.

2-33/ 5 Where does the "1570 acres minimum up to 6122 acres" for a withdrawal come from? This question also applies to page 4-67, section 4.12.1.3, first bullet. All of the affected County forest land would need to be withdrawn if acquired by the ANG.

2-34/ Section 2.6.2 See general comments about the conclusion statement made here. The mention of mitigation is too vague to support the conclusions of non-significant environmental impacts. More details are needed on specific kinds of mitigation that might actually be accomplished.

2-35/ 1 The last sentence ignores impacts to landowners of replacement lands for those withdrawn from the county forest. Typo in last sentence: "loose".

IV. SECTION 3: AFFECTED ENVIRONMENT

3-1/1 The DEIS suffers from an inconsistent presentation of data that is no doubt the result of several different consultants working on different sections of the document. For example, in the description of the plant communities present in the "Affected Environment" (chapter 3), the forested communities listed are "wet", "mesic", and "dry" forests. In the description of the area in the Biological Survey (Appendix L), the forested communities noted as present are "mixed deciduous woodland", "dry oak woodland", and "pine woodland". Similarly, timber wolves are listed as "recorded" within or near the Restricted Area R-6904A (Table 3-19) and as "potentially occurring" at the existing gunnery range, Volk Field, and the proposed expansion area (Table 3-8) in the Biological Survey (Appendix L), but are not listed in Table 6, entitled "Mammals potentially Occurring within the Hardwood Range and Proposed Expansion Area" of the Land Use Management Guidelines (Appendix K).

RESPONSES TO COMMENTS

Response to Comment No. 53

Comment noted. Text changes made in Subsections 2.6.1.10 and 4.10.1.3 to clarify these points.

Response to Comment No. 54

As identified in Subsection 4.11.2.2, aircraft overflights are restricted to no less than 1,000 feet AGL in portion of the restricted airspace that overlies the Necedah NWR and Wood County SWA. Risks from aircraft mishaps with waterfowl are discussed in Subsection 4.3.3.

Response to Comment No. 55

See response to Comment No. 7.

Response to Comment No. 56

This information is summarized from the Socioeconomic Study that is now completed and presented as Appendix I.

Response to Comment No. 57

Currently implemented mitigation measures associated with the Proposed Action are specified in Subsection 4.17 of the EIS. Should the proposal for the range expansion be adopted, additional construction-specific mitigation would be developed to control potential environmental impacts associated with the construction phase of the project and range management practices would also ensure operational mitigation would also be practiced. Such construction and operational mitigation measures can not be specifically identified prior to the development of detailed construction plans for the expanded range area.

Response to Comment No. 58

Comment noted. The text of the EIS has been corrected.

Response to Comment No. 59

Comment noted. The EIS has been revised to make vegetation community descriptions more consistent. Timber wolves have not been documented on Hardwood Range, Volk Field, or within the proposed expansion area but have been recorded in nearby wildlife areas. Therefore, the descriptors "recorded in or near" R6904A and "potentially occurring" within Hardwood Range, Volk Field, or the proposed expansion area are not inconsistent.

3-3/ 4 This area receives special aviation use to conduct wildlife surveys. These surveys are used to monitor radio-collared wolves, other rare and endangered species, waterfowl, and deer. This is not addressed in this section nor in Section 4.0 Environmental Consequences. In the past, gaining flight access into these MOA's has been difficult or impossible during optimal survey periods.

3-4/ Figure 3-1 and Page 3-11 (Figure 3-3) It would be helpful if the R-6901 area were labelled as Fort McCoy area, as done later in the DEIS.

3-5/ 2 How far are the "Speed Wing and Gottschalk" private airports from the proposed boundary of R-6904A? What would be the impacts on use of these private airports?

3-12/ 4 The term Maximum Sound Level (Lmax) is introduced on page 3-12 and in F.1.2.1 and it states it is an important parameter, yet no analyses are presented that evaluate the maximum sound levels. The maximum sound levels need to be addressed in the EIS.

The definitions of decibel, sound exposure level, and onset adjusted day-night sound level would be better understood if they included the equations for calculating these metrics, especially for sound exposure level and onset adjusted day-night sound level. Example from NIOSH web page (<http://www.cdc.gov/niosh/noised.html>): Decibel (dB) A dimensionless unit used in physics, which is equal to 10 times the logarithm to the base 10 of the ratio of two values: $dB = 10 \log(\text{value1}/\text{value2})$.

3-17/ Table 3-4 The notes should include the assumed flight level used.

3-17/ 1 Why are the projections for the Falls 1 and 2 and Volk South MOA's worst case scenarios different?

3-19/ Section 3.3.1.1 Fires do regularly occur on the range and have occurred outside of the range due to aircraft activity. ANG personnel have been very cooperative in working with area forestry staff in fire suppression efforts. Flares are also used in the MOA's during flight exercises and has occurred during high fire danger days (e.g., during the September 26, 1996 exercise over the Sandhill Refuge). Who determines when fire hazard is low and what are the criteria for such determinations? What restrictions are there for use of flares during high fire danger days?

3-20/ Section 3.3.1.2 Same comment for section 3.3.2.2. What is the history of dropped objects for the range and current airspace as compared to the probabilities calculated?

3-24/bottom. The accident list should include the range and all associated air space including travel from exercising units.

3-28/ 2 Gulls are not migratory waterfowl.

3-28/ 2&5 Waterfowl migratory periods in this area are from September 15-November 15 and from March 15-June 1. Migratory flights are not necessarily during night time only. Since this area contains significant waterfowl staging areas, the normal flight migrations are at much lower altitudes than described. Restricted area R-6904B is directly over and adjacent to several wetland sites which provide critical habitat for migratory birds. Migratory birds that use these staging areas tend to fly

RESPONSES TO COMMENTS

Response to Comment No. 60

Interested parties should call Volk Field at (608) 427-1201 to resolve current operations problems and to coordinate your wildlife survey requirements. Aircraft on a VFR flight plan are authorized to transit military operations areas (MOAs) at all times at the pilot's discretion. To help determine if the MOA is scheduled to be used during the desired transit time, pilots can call (800) 972-8673 or listen to an ANG-sponsored airspace information system recording broadcast on frequency 120.0 MHz. The ANG initiated this recording as a service to pilots so they can plan their flights knowing the military's planned activities. The aircraft have unimpeded access to MOAs during periods of non use.

Response to Comment No. 61

Comment noted. Figure 3-1 changed to add notation identifying the Fort McCoy restricted airspace.

Response to Comment No. 62

The Speed Wing and Gottschalk private landing zones would be north of the proposed range expansion boundary. The southern end of the Gottschalk landing zone aligns with the northern border of the proposed range expansion. Both landing zones are beneath the existing R-6904A airspace that extends down to 150 feet above ground level. Military pilots operating at Hardwood Range are aware of the location of these two landing zones, and are aware of the occasional operations into and out of each landing zone. Those who use the landing zones should call Volk Field at (608) 427-1201 to coordinate their activities. Such interested parties should also listen to 120.0 MHz (an airspace information system) to determine when the range and the adjoining airspace is scheduled for use or call (800) 972-8673.

Response to Comment No. 63

The maximum sound level (Lmax) varies constantly during a noise event. Therefore, the Sound Exposure Level (SEL), which considers the total sound associated with an event, is felt to be a better metric to assess annoyance with noise. Due to the fact that SEL normalizes all of the noise associated with an event to a one-second time interval, its value will typically be greater than the maximum sound level.

RESPONSES TO COMMENTS

Response to Comment No. 64

In acoustics, the decibel level of a sound is determined by first considering the sound pressure level. It is calculated by:

$$SPL = 20 \times \log_{10} \left(\frac{p}{p_0} \right)$$

Where: SPL = Sound Pressure Level, in decibels
 p = the pressure of the sound, in Pascals
 p₀ = the reference pressure (20 μ Pascals)

Then, if applicable, SPLs are “weighted” across their frequency bands. As noted in the document, all noise associated with aircraft operations is “A-weighted.”

Sound Exposure Level normalizes all of the acoustic energy associated with a sound event to a one-second time period. It is calculated by:

$$SEL = 10 \times \log_{10} \left[\int_{t_1}^{t_2} 10^{\frac{L_A(t)}{10}} dt \right]$$

Where: L_A(t) is the time varying value of the A-weighted Sound Level in the interval t₁ to t₂.
 t₁ is the time at which the level exceeds 10 dB below the maximum value.
 t₂ is the time at which the level drops 10 dB below the maximum value

The Onset Rate Adjusted Day-Night Average Noise Level metric (L_{dnmr}) is calculated using the same equation as that used for calculating Day-Night Average Noise Levels (L_{dn}).

$$L_{dn} = 10 \times \log_{10} \left[\frac{1}{86,400} \left(\int_{7am}^{10pm} 10^{\frac{L_A(t)}{10}} dt + \int_{10pm}^{7am} 10^{\frac{(L_A(t)+10)}{10}} dt \right) \right]$$

RESPONSES TO COMMENTS

Where: 86,400 is the number of seconds in a 24-hour period
 $L_A(t)$ is the time varying value of the A-weighted sound level.

However, for L_{dnmr} , as $L_A(t)$ is being determined, in addition to the 10 dB penalty assigned to night operations, an additional penalty of up to 11 dB may also be added based on the onset rate of the noise increase as the aircraft approaches a receptor. This onset-rate penalty is determined through the following relationship:

$$OnsetRatePenalty = 11.0 \times \log_{10}(OR) - 12.915 \leq OR \leq 150$$

Where: OR = Onset-Rate, in dB per second

Should the Onset-Rate be greater than 150 dB per second, the penalty added is 11 dB; if the Onset-Rate is less than 15 dB per second, no penalty is added.

Onset-Rate (in dB per second) for a given condition is calculated by

$$OnsetRate = 3.671596 + e^{(-1.16677 - 0.001848 \times ALT - 0.000580 \times OFFSET + 0.0045 \times VEL + 0.028842 \times S)}$$

Where: VEL = aircraft airspeed, in nautical miles per hour
 ALT = aircraft altitude, in feet
 OFFSET = aircraft slant range, to a ground point, in feet
 SEL = Sound Exposure Level at a ground point, adjusted for air absorption and lateral attenuation

Response to Comment No. 65

Altitudes used vary by each aircraft type, the airspace used, and the type of training performed. Unless constrained by the configuration of the airspace, altitudes range from 500 feet above ground level to greater than 10,000 feet, and the aircraft are distributed throughout those altitude ranges by ratios based on operational experience.

Response to Comment No. 66

The Falls 1, Falls 2, and Volk South MOAs are all different airspaces. Each airspace has a different level of operations associated with it. Also, different types and mixes of aircraft use these airspaces.

RESPONSES TO COMMENTS

Response to Comment No. 67

The primary potential impact associated with flare use is the possibility of burning material reaching the ground and igniting a fire, which could create significant secondary environmental impacts. Minimum release altitudes established for flare release, and the complete cessation of flare use during periods of extreme fire risk minimize this risk. Toxicity is not a concern since magnesium, the primary material found in flares, is not highly toxic, and it is extremely unlikely that humans or animals would ingest flare material. Impulse cartridges and initiators used with some flares contain chromium and, in some cases, lead, which are hazardous air pollutants under the Clean Air Act. A screening health risk assessment concluded that they do not present a significant health risk in the quantities involved. Laboratory analyses of flare pellets and flare ash indicate that these materials have little potential for affecting soil or water resources. Field studies indicate that flare debris does not accumulate in noticeable quantities; therefore, there is little potential for impact to aesthetic resources.

Range staff are responsible for determining the sensitivity of fire risk. When fire risk is considered high, the use of all pyrotechnic devices is prohibited on the range.

Response to Comment No. 68

Such data are not available in any statistically sound format. Often, small components (such as a small bolt) are only discovered missing during detailed visual inspection of the aircraft, with no means of determining how, where, or when it separated from the aircraft. The sample scenario was specifically developed to consider the risk associated with such an event occurring. Although the scenario incorporates several stated assumptions, it is felt that it does bound the risk associated with dropped objects, and that risk is considered low.

Response to Comment No. 69

A complete discussion of Class A mishap rates is contained in Subsection 3.3.3.1 of the EIS. Tabulation of statistical projections for Class A mishaps for each aircraft using the airspace associated with this proposal is presented in Subsections 3.3.3.1 and 4.3.3 for current and proposed use conditions, respectively.

Response to Comment No. 70

Comment noted. The text in the EIS has been changed.

Response to Comment No. 71

Comment noted. Text in the EIS has been changed to reflect this information.

during diurnal periods at lower levels to other nearby feeding areas. Many songbirds also navigate in areas other than along major rivers.

3-28/ 7 What about bird strikes in VR-1616?

3-29/ 2 How do EOD personnel render the debris safe? Is it still by burning in a dug pit with jet fuel, or has this practice been discontinued?

3-29/ 5 Has there ever been an inadvertent release at Hardwood?

3-31/ Section 3.4.1 This section discusses an area on the property that has been used for the annual burning and burial of spent munitions since 1976. Is it still in use? If so, is this the location that the ordnance debris is taken to as discussed in section 3.3.4.1 (discussed above)? A map should be provided showing its location. What are the constituents in the plume of contaminated groundwater? Are the materials still burned? What are the specific activities that go on? What is used to start the fire? If the materials are still burned, there should be some discussion elsewhere in the EIS relative to air quality. If it is no longer in use, when was this activity ceased?

3-31/ 4 How are used oil and antifreeze disposed of? Last paragraph - How are lithium batteries disposed of, both in the past and currently? What about batteries in target vehicles?

3-32/ 3 What is the history of all past underground fuel storage tanks at the range and their removal and cleanup? According to ANG's 1984 report, "Installation Restoration Program Records Search, 8204th Permanent Field Training Site, Wisconsin Air National Guard Volk Field Air National Guard Base, Camp Douglas, Wisconsin, Hazardous Materials Technical Center," the Hardwood Range had one 550-gallon underground unleaded gas tank and two 550-gallon underground #1 diesel fuel tanks as of March 1983. However, ANG's Installation Restoration Program, Wisconsin Air National Guard Volk Field, Camp Douglas, Wisconsin, Underground Storage Tank Closure Assessment Hardwood Range" dated March 1994, states, "At the time of tank closure, the Hardwood Range UST site consisted of two inactive USTs; one 1,000-gallon (gal) unleaded gasoline tank and one 560 gal diesel tank." It also stated, "No other USTs are present at Hardwood Range and none have been removed previously from any location at the Hardwood Range facility." ANG should explain the discrepancies in numbers and sizes of UST's, update the removal status and confirm whether there are any UST's left at the range. In paragraph 4, sentence 3, it would be useful to describe what the groundwater is "contaminated" with. Paragraph 5, a description of past and present cleaning practices of used fuel tanks used as targets might fit here. Paragraph 6, is there lead coating on the steel and/or aluminum machine gun bullets used? If so, does this lead go into the air? The soil? Waters? Do the helicopters' machine guns fire lead bullets? If the answer is yes to any of these, this needs environmental impact analysis, and page 3-40, paragraph 2, sentence 7 would also need to be changed.

3-32/ last The DEIS should provide more information on total amounts of chemical usage for the range and the proposed expansion. What are the environmental impact differences expected between bombing and strafing in the current upland area and the proposed new target areas in a wetland rich environment? The EIS should address potential for groundwater impacts associated with such a change. The discussion of titanium tetrachloride as "not classified as toxic" is not accurate. This substance is listed by DOT and EPA on the Hazardous Substances List and the chemical is on the

RESPONSES TO COMMENTS

Response to Comment No. 72

VR-1616 was not specifically assessed in this EIS except as it contributed to cumulative impacts. However, as described in Subsection 3.3.3.2 in Volume I of the EIS, no bird strikes have occurred in the Falls I MOA and coincidental VR-1616 during the last five years.

Response to Comment No. 73

Expended ordnance is removed from the range at regular intervals. During collection, training ordnance is inspected to determine if a spotting charge may have malfunctioned and failed to detonate. If suspect, explosive ordnance disposal specialists render the ordnance safe using a small explosive charge. Then, all metal casings are collected and recycled as scrap metal. Burning was discontinued in 1988.

Response to Comment No. 74

Since 1954, there have been no documented inadvertent releases of training ordnance at Hardwood Range. Modern aircraft have safeguards which render such an occurrence highly unlikely.

Response to Comment No. 75

Only one defense Installation Restoration Program (IRP) project is located on the range. This site was used from 1976 to 1988 for annual burning and burial of spent munitions. Volatile organic compounds and semi-volatile organic compounds were detected in some samples. An IRP Feasibility Study for five sites (4 at Volk Field and one at Hardwood Range) was developed and has been recently (March 1998) released for public comment. The IRP site is located in the southwestern portion of the range approximately 0.5 miles from either border. A map has been included in the FEIS. The text has been modified to include this information.

RESPONSES TO COMMENTS

Response to Comment No. 76

The Wisconsin ANG hires a private contractor to recycle the used oil and antifreeze. Lithium batteries are considered a hazardous waste. The Wisconsin ANG either hires a private contractor to dispose of the batteries or turns them into the Defense Reutilization and Marketing Office (DRMO). Batteries from target vehicles are also either disposed of through a private contractor or turned into the DRMO.

Response to Comment No. 77

The underground storage tanks (USTs) at the Hardwood Range were removed in 1992. Site remediation was performed at the time of tank removal. Contaminated soil was removed and treated offsite by a private contractor. The sites were closed by WDNR in 1996.

Response to Comment No. 78

As discussed in Subsections 3.4.1, and 4.4.1, very little hazardous waste is generated by activities occurring on the range. The range expansion would result in these same activities. No additional chemicals besides those already used on the range would occur. An increase in gas consumption could occur for range maintenance, however, this increase would be minor as the distance to the range from the compound area is only a few additional miles. The Hardwood Range is listed as a conditionally exempt small quantity generator. Since the trend in hazardous waste and non-hazardous waste disposal is decreasing, a slight increase due to range expansion would not change the generator status. A spill plan would be updated to address potential chemical spills clean-up procedures to prevent contamination to groundwater resources.

As identified, titanium tetrachloride is an irritant to the skin, eyes and mucous membranes, but is not classified as toxic. Titanium compounds are considered to be physiologically inert (Sax and Lewis 1987), and neither flammable nor combustible (Akzo Chemicals 1991).

RESPONSES TO COMMENTS

Response to Comment No. 81

Subsection 3.6.1.2 indicates that in the range expansion area, the elevation of the shallow aquifer often raises above the ground surface level during periods of high precipitation, and shows that strong relationships exist between surface water and groundwater. These flooded conditions represent the worst-case scenario for evaluating potential impacts to surface and groundwater quality and were considered in this analysis.

Subsection 4.6.2 discusses potential impacts that could occur to both surface and groundwater resources. Construction activities and use of the target complex, landing zone, and drop zone could impact drainage patterns within the range expansion area because small diversions or drainages may need to be developed to route drainage around facilities. Localized changes in drainage patterns or routing drainage would not use water and would not affect water quantity in the region. Subsection 4.5.2.3 indicates that use of the tactical target complex and construction activities could increase soil erosion in localized areas, potentially causing impacts to water quality. These impacts would be mitigated and managed through the use of Best Management Practices (BMPs) to stabilize and minimize soil movement at the areas of disturbance. Potential sources of pollutants to surface and groundwater in the range expansion area are from aircraft mishaps (i.e. crashes) and from munitions. These sources and the fate of potential pollutants are discussed in Subsection 3.3.3.1 (Aircraft Mishaps), Subsection 3.3.4.1 (Munitions Use and Handling), and Subsection 3.4.1 (Hazardous Materials and Solid Waste). Based on this information adverse impacts to surface and groundwater quality or drinking water supplies would not be expected. Subsections 4.5.2.3 (Water Quality) were modified to reference the appropriate subsections in Section 3, and discuss conclusions regarding water quality.

Response to Comment No. 82

Comment noted. The text has been modified to read "evapotranspiration."

Response to Comment No. 83

As discussed in Subsection 3.6.1.3, the water quality data generally meet the quality criteria of NR 140, Wisconsin Administrative Code. The ground water quality data in Table 3-9 is delineated by each underlying aquifer source. These aquifers underlie large areas throughout the region, including areas of both the range expansion area and the existing range.

Special Health Hazard Substance List because it is a corrosive.

3-33/ 1 Though we understand that the possibility of crashes is remote, we have concern on the mechanisms used to address emergency situations, especially involving the potential spills of hazardous substances. This concern is based on our frustration with ANG's slow response and communication problems in the aftermath of the F-16 crash in Trempealeau County in 1996.

3-34/ 3 What is meant by "isolated wetlands"?

3-36/ 1 The "Groundwater" section should give a range of depths expected to groundwater; at least approximations.

3-36/ 3 What is "transeaporation"? Do you mean "evapotranspiration"?

3-37/ 2 Does "the groundwater generally meet criteria" on the expansion site, at the existing range, or both?

3-37/ section 3.6.1.4 The DEIS should quantify the wetlands found in the project area, especially those found in the areas of proposed facilities. The wetlands should be shown on a figure with more detail than that provided on existing Wisconsin Wetland Inventory maps (i.e. some ground truthing is required).

3-38/ section 3.6.1.5 The DEIS should at least provide a figure that shows the location of floodplains and the relation of such to proposed facilities.

3-39/ This chart could include acres of wetland by type to give the scope of the total wetlands located with the 7100+ acres.

3-40/ section 3.7.1 There is no mention nor an analysis of lead from fuel. Page 3-40 stated that lead was not considered because the only source is lead from munitions. Does this mean there is no lead in jet fuel? Please clarify in the EIS.

3-42/ Section 3.7.1.3 There are two areas in the State located near industrial facilities which are designated non-attainment for SO₂ and are currently undergoing redesignation to attainment status, Rib Mountain and Weston/Rothschild. These areas will not be impacted by the Proposed Action. There is one PSD Class I area in Wisconsin. The closest PSD Class I area to the Proposed Action is located in the Rainbow Lake area, located in the Chequamegon National Forest, north of Drummond. The area is over 100 miles north of the VR-1616 and would not be affected by the Proposed Action.

3-50/ 1 The region of influence (ROI) for biological resources is not adequately addressed. Section 3.2.1.1 does not exist in the DEIS.

3-50/ section 3.8.1.1 A chart showing acres by type would be meaningful. Since 6,162 acres are county owned, most of this information would be available from the DNR Bureau of Forestry's recon data. Similarly, since part of the 975 private acres are under the tax law program, they would also have acres by types. The field surveys and other vegetation listings in the EIS's appendices should

RESPONSES TO COMMENTS

Response to Comment No. 79

The initial response to an aircraft accident focuses on rescue, evacuation, fire suppression, safety, and elimination of explosive devices, ensuring security of the area, and other actions immediately necessary to prevent loss of life or further property damage. Subsequently, the investigation phase is accomplished.

If an aircraft accident occurs on non-federal property, regardless of the agency initially responding to the situation, as soon as the situation is stabilized, a National Defense Area will normally be established around the accident scene, and the site will be secured for the investigation phase.

As soon as possible after all required investigative actions on the site are complete, the aircraft will be removed, and the base civil engineer will accomplish clean-up of the site, or will have a contract to an outside agency to accomplish the clean-up.

In the event of an aircraft mishap, the ANG puts the highest priority on human health and safety and any immediate threat to the environment. The ANG also takes complete responsibility for cleanup of all sites by working in close coordination with a wide range of Federal, state, and local officials.

Response to Comment No. 80

The text of the EIS was revised to read, "Much of the site, except the far eastern region, is occupied by wetlands." Refer to Subsection 3.6.1.4 of Volume I of this EIS for further discussion of wetlands.

RESPONSES TO COMMENTS

Response to Comment No. 84

See response to Comment No. 50.

The ANG has not determined the specific locations for new facilities within the expansion area; however, the ANG firmly commits to not impact wetlands in development of the proposed expansion area. Much of the Hardwood Range, proposed expansion area, and surrounding areas are comprised of similar wetlands that would continue to function unimpeded at the regional level.

Due to the size of the project area; the extent of wetlands; and the lack of specific design and siting details on the proposed facilities, the use of Wisconsin Wetland Inventory maps is adequate for this analysis.

Response to Comment No. 85

Floodplain maps provided by the Federal Emergency Management Agency (FEMA) were provided in Appendix K of the EIS.

Response to Comment No. 86

See response to Comment No. 84.

Response to Comment No. 87

Emission factors for aviation fuel (JP-8) do not include a value for lead. Lead is not a component of aviation fuel. The text of the EIS has been edited for clarification.

Response to Comment No. 88

Subsection 3.7.1.3 of the EIS has been revised to clarify this issue. Also, see response to Comment No. 150.

Response to Comment No. 89

Comment noted. The EIS text has been revised to reflect these editorial corrections.

Response to Comment No. 90

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

RESPONSES TO COMMENTS

also be summarized here.

While the nomenclature of Curtis is satisfactory, Kotar's guide to forest communities should also be used.

3-53/ section 3.8.1.2 Because no biotic inventory has been completed either on the existing range or the proposed expansion area, there are no data to support statements like, "Common mammal/bird/reptile and amphibian/fish species within the bounds of Restricted Area R-6904A include...." It is unlikely that the Eastern massasauga rattlesnake (State listed as Threatened and Federal Species of Concern) is a "common" reptile within the Restricted Area. Field work will need to be done on the expansion area to identify the location of any nesting rookeries of the double-crested cormorant, great blue heron and yellow crowned night heron.

3-53/ section 3.8.1.3 Although an understatement, this section does include the acknowledgement that, "the Hardwood Range and the proposed expansion area had not been extensively inventoried." However, it goes on to state that a biological survey of both the existing range and the proposed expansion area was conducted to provide additional baseline information. The implication is that this Biological Survey, as presented in Appendix L, generated the data needed to fill the inventory gaps mentioned. This is inaccurate. The information presented is primarily a compilation of existing data and is not a "survey" in the biological sense.

The striped hairstreak (*Satyrium liparops*) is no longer on the Special Concern list.

3-55/ Table 3-19 The trumpeter swan and sharp-tailed grouse need to be added to the list.

3-56/ Section 3.8.1.4 The Department provided information to one of ANG's consultants working on the DEIS regarding three State Natural Areas occurring near R-6904A and one, Cranberry Creek Mound Group State Natural Area, that appears (from Figure 3.2) to be within, or immediately on the perimeter of, Restricted Area R6904A. The presence of these State Natural Areas should be acknowledged in this section. The section heading "Sensitive Habitat" implies that there are no sensitive habitats within the project area. The Restricted Area and all of the MOA's contain sensitive habitats for several plant and wildlife species.

3-57/ 1 Fires started by lightning are rare in Wisconsin; most start by debris burning.

3-57/ 5 Only Juneau County Forest is listed. Jackson, Clark, Eau Claire, and other county forests should also be described. The biological resources in the Volk West MOA need to be addressed due to secondary impacts. The Juneau County Forest is not for "paper processing" but is managed for sustainable forestry as established by the approved 10-year plan.

3-59/ 1 Inventory of raptor nest general locations should be provided or at least quantified.

3-59/ third bullet Areas of biological concern is inadequate for the Meadow Valley Wildlife Area (third sub-heading). Describe the "other flowages". Timber wolf and trumpeter swan populations and habitat are not addressed.

3-59/ last bullet Whitetail deer, which are not listed, are very abundant in Buckhorn State Park.

Response to Comment No. 91

Lists of potentially occurring and documented wildlife species were drawn from existing species lists from Hardwood Range and other nearby areas, published literature, and assessments based on knowledge of the fauna associated with plant communities present in the proposed expansion area. Surveys for nesting raptors and Karner blue butterflies were conducted in the proposed expansion area. Nesting rookeries of great blue herons, yellow-crowned night herons, and double-crested cormorants were not observed during these surveys but may occur within the proposed expansion area. The EIS text has been modified to reflect the fact that the eastern massasauga rattlesnake is unlikely to be common within Restricted Area R-6904A.

Response to Comment No. 92

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 93

Comment noted. The EIS text has been revised to reflect these corrections.

Response to Comment No. 94

Comment noted. The EIS text has been revised to reflect these corrections.

Response to Comment No. 95

Comment noted. The EIS text has been revised to reflect these corrections.

Response to Comment No. 96

Comment noted. The EIS text has been revised to reflect these corrections.

Response to Comment No. 97

The proposed action does not include any ground-based activities or changes in airspace utilization for Volk West MOA. Therefore, no primary or secondary impacts would be likely to occur in the MOA. The EIS text has been revised to reflect the management goals of the Juneau County Forest.

Response to Comment No. 98

The EIS text has been modified to include available information regarding raptor occurrences within areas of biological concern in Falls 1, Falls 2, and Volk South MOAs. Because most areas within the MOAs have not been inventoried, however, raptor occurrence data in these areas will be of limited use in quantifying potential impacts of the proposal.

RESPONSES TO COMMENTS

Response to Comment No. 99

The EIS text has been modified to include additional information regarding the biological resources of Meadow Valley Wildlife Area.

Response to Comment No. 100

Comment noted. The EIS text has been revised to reflect this correction.

3-60/ Section 3.8.2.3 The way this section is constructed, it appears that only those rare species known to occur within the Volk South MOA are listed. Rare species known to occur within Falls 1 and 2 MOA's should also be noted. In addition, neither this section nor the following section on land use makes reference to State Natural Areas or other high-quality natural communities occurring within the MOA's. The general locations of these areas should be presented along with their ecological attributes.	101
3-60/ 4 Restoration efforts for the trumpeter swan have also occurred on the Meadow Valley Wildlife Area.	102
3-61/ Table 3-20 The trumpeter swan is not included on this list.	103
3-69/3 There are no lands leased from the Department of Natural Resources.	104
3-73/ 4 The Wood County Forest is referred to as "Wood County Forest Crop Land". This is outdated terminology; the word "Crop" was dropped over 30 years ago. This is also on the map on the following page, and also used on pages 3-77, 3-78, 4-61 and 4-62. This could cause some confusion to various readers with the present Forest <u>Crop</u> Law for private lands. The county forest is not managed for "roads".	105
3-74/ The map legend lacks some of the shading used. The map's diagonal cross-hatching in the shaded areas need to be explained in the key.	106
3-75/ This map is a different scale than other maps and thus is difficult to allow "overlays" of information.	107
3-77/ top "Wood County Forest Land" should be "Wood County Forestry Department"	108
3-77/ last The information on Juneau County Forest located within the existing hardwood range is out-of-date, as mentioned in our previous letter of 8/20/97 to Kevin Marek on the Draft Socioeconomic Study. This land has been withdrawn and is not part of the Juneau County Forest; it is Juneau County land. Recreation on these lands may include the list at the top of page 3-78, but the activities are severely limited due to military use of the area.	109
3-77/ 1 Camping needs to be included in the State Wildlife Area recreational unit in Table 3-22. The correct title for the Wood County Public Hunting Grounds is the Wood County Wildlife Area.	110
3-80/ 2 The dams do not drain into the large reservoirs as stated, they created the reservoirs.	111
3-81/ Figure 3-8 The County Forest symbols are missing on the map for the Juneau and Wood County Forests.	112
3-82/ 1 The Black River Falls State Forest should not be called a "park" in the third sentence.	113
3-82/ 5 After "Class 1 or 2", the word "trout" should be added before "streams".	114
3-82/ 6 The snowmobile routes should be shown on a figure.	115

RESPONSES TO COMMENTS

Response to Comment No. 101

The EIS text has been modified to include additional information regarding sensitive species locations and state Natural Areas within the ROI.

Response to Comment No. 102

Comment noted. The EIS text has been revised to reflect this correction.

Response to Comment No. 103

Comment noted. The EIS text has been revised to reflect this correction.

Response to Comment No. 104

The text was changed to remove the reference to leased lands.

Response to Comment No. 105

Comment noted. Corrections have been made to the figure identified and all related text.

Response to Comment No. 106

Comment noted. Addition to legend made.

Response to Comment No. 107

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 108

Comment noted. Correction to text made.

Response to Comment No. 109

Comment noted. Clarification to text made.

Response to Comment No. 110

Comment noted. Additions to text made.

Response to Comment No. 111

Comment noted. The EIS text has been corrected.

RESPONSES TO COMMENTS**Response to Comment No. 112**

Comment noted. This figure has been corrected.

Response to Comment No. 113

Comment noted. The EIS text has been corrected.

Response to Comment No. 114

Comment noted. The EIS text has been corrected.

Response to Comment No. 115

The text of the EIS lists a reference that contains a map, which depicts all snowmobile routes. A visual depiction of the routes within the ROI is not necessary for the purposes of this EIS, since impacts to snowmobiling is not anticipated.

3-83/ 1 Include county forests in the list of resource areas in Volk South MOA including Juneau County Forest and Monroe County Forest. This section is very vague and does not describe how much recreational activity occurs. } 116

3-85/ 4 What is the paper mill "south" of the range? Is this the paper mill to the northeast? Also in this section, there is no recognition of Sandhill Wildlife Area. } 117

3-87/ 2 Why is there an implied greater scenic value because of Amish presence or ownership? } 118

3-89, Section 3.12 Please refer to our letter to Kevin Marek dated August 20, 1997. } 119

3-90/ 4 The discussion of replacement lands associated with the 1997 Juneau County forest withdrawal is inaccurate and misleading. Rather than "identical acreage" added in Finley Township, it would be better to say that a substantial acreage was added in Finley Township, southwest of the range, and other areas in Armenia, Cutler and Necedah Townships were also added. The discussion should also recognize that this land was already owned by the county, as compared to the potential situation for replacement in Wood County which could involve county purchase of private lands. } 120

3-91/ Forestry The EIS should use updated timber appraisal information as supplied during our review of the Draft Socioeconomic Study. Also, update timber sale revenue (to be supplied by Wood County Forest Administrator). The State doesn't receive 20% of revenues, as the county has no outstanding loans. } 121

3-95 through 3-100/ Demographics In what appears to be an attempt to demonstrate that the proposed action has little or no impact on regional tourism and agriculture, ANG has made little effort to accurately describe relevant information. For instance, page 3-95 paragraph 2 and tables 3-23, 3-24, and 3-25 describe La Crosse County as being in Falls 1 MOA. No portion of Falls 1 MOA or the MTR's overlie La Crosse County. No portion of Volk South MOA overlies Jackson County. } 122

The definition of "Earnings" used in the tables should be described. Based on communication with the West Central Wisconsin and Mississippi River Regional Planning Commissions, the extent that agriculture and tourism contribute to local economies may be substantially understated by tables in the DEIS. When all these tables are combined to develop an ROI total, it fails to recognize that only small portions of some counties underlie a MOA as compared to others, thus possibly misrepresenting the economic impacts Hardwood Range or MOA utilization expansion may have. To correct this, ANG should contact appropriate Regional Planning Commissions and request meaningful demographic baseline information and an independent analysis of potential impacts from proposed range and air space utilization increases. } 123

V. SECTION 4: ENVIRONMENTAL CONSEQUENCES

4-2/ Section 4.1 The general findings are incorrect. See comments on Section 3.1.1. } 124

4-3/ Section 4.1.2.1 The location of the Gottschalk airstrip, apparently immediately abutting the expansion, should be recognized. } 125

RESPONSES TO COMMENTS

Response to Comment No. 116

The EIS text has been corrected to add references to County forests. All information regarding recreational activity that is pertinent to the impact analysis is presented in this section.

Response to Comment No. 117

Comment noted. Subsection 3.11.1 has been corrected to respond to this comment.

Response to Comment No. 118

The Amish community was given as an example of pictorial rural countryside for a reference to the reader. Numerous examples of such farmlands could be found throughout the area. Other areas which could be noted for their scenic value are listed in Appendix J.

Response to Comment No. 119

The referenced Wisconsin DNR letter dated 8/20/97 has been considered along with other comments provided by the State.

Response to Comment No. 120

The new information on location and ownership of the CFL replacement lands in Juneau County has been incorporated.

Response to Comment No. 121

The updated information on timber appraisal, timber sale revenue, and the forestry loan balance has been incorporated.

Response to Comment No. 122

The comment is based on incorrect information regarding the geography underlying the affected airspace. The Falls 1 MOA does overlie a small area in the NE corner of LaCrosse County and the Volk South MOA does overlie a small area of the SE corner of Jackson County. However, to more accurately reflect the demographics of the area under the airspace, data for those counties which have negligible area under the affected airspace will be excluded from the ROI. This modification does not change the conclusion of the analysis that no significant adverse impacts will result to the socioeconomic resources of the region.

RESPONSES TO COMMENTS

Response to Comment No. 123

The socioeconomic analysis for airspace has been modified to exclude those counties which have negligible area under the affected airspace. The earnings data provided in the EIS were obtained from the Bureau of Economic Analysis, are widely used in EIS analyses of socioeconomic resources, and are deemed reliable. Because no significant or adverse impacts to the tourism or agriculture industries are expected (due to the negligible affects to noise and biological resources), an additional independent analysis would be of little value.

Response to Comment No. 124

The proposed range expansion is not anticipated to have an adverse impact on "Spirit of Marshfield" helicopter medevac operations. The Marshfield Base Manager has an agreement with Volk Field personnel which includes procedures to ensure that military flight operations will be curtailed, if necessary, to ensure that "Spirit of Marshfield" flights with patients will have direct, unimpeded access to their destination. In addition, Minneapolis Air Route Traffic Control Center personnel assign the necessary priority to "Spirit of Marshfield" flights to ensure direct light routing. The Marshfield Base Manager has also established an excellent working relationship with Volk Field personnel to ensure that problems are resolved as they are identified.

Response to Comment No. 125

See response to Comment No. 62.

4-8/ 4 - Was munitions use considered in the "worst case analysis" for noise, especially in areas in and near the existing and proposed expansion of the range?

4-8/ section 4.2.1.3 The Sound Exposure Levels described from modeling seem to be the result only of aircraft at a height of between ½ to one mile away. Analysis of various overflight heights is needed along with an estimated frequency of times the flights will be at 500 ft versus ½ or one mile. Do we understand it correctly that Table 4.2, for example is for flights that are between ½ to 1 mile away (see for example the first paragraph on page 4-8 (last paragraph of section 4.2.1.2)?

The DEIS mentions, but does not substantively address the issue of instantaneous exposures to sound and auditory effects. NIOSH is proposing a maximum sound level for occupational exposures of 115 dBA (Source: Criteria for a Recommended Standard - Occupational Noise Exposure Revised Criteria 1996 section 1.1.4 Ceiling Limit Occupational exposure to continuous, varying and/or intermittent noise shall not exceed 115 dBA). Will there be any likelihood of exposure events above this criteria? [Note: here is additional information on the ceiling limit for noise from the NIOSH document - 3.2 CEILING LIMIT. NIOSH [1972] also recommended a ceiling limit of 115 dBA. Exposures to noise levels greater than 115 dBA would not be permitted regardless of the duration of the exposure. This ceiling limit is based on the assumption that above a critical intensity level the ear's response to energy no longer has a relation to the duration of the exposure, but is only related to the intensity of the exposure. Recent research with animals indicates that the critical level is between 115 and 120 dBA [Price and Kalb 1991; Henderson et al. 1991; Danielson et al. 1991]. Below this critical level, the amount of PTS is related to the intensity and duration of exposure; but above this critical level, the relationship does not hold. For a noise standard to be protective, there should be a noise ceiling level above which no unprotected exposure is permitted. Given the recent data, 115 dBA is a reasonable ceiling limit beyond which no unprotected exposure should be permitted.

In one section of the DEIS it assumes that houses have insulated walls, etc. and will reduce outdoor noise levels by up to 20 dB. It should be stated that this assumption only works if one assumes windows are closed year round. This is not a realistic assumption during many months of the year, as many homes do not have central air conditioning.

Farmers are, as a group, already at high risk of occupational hearing loss. How would this added exposure to sound energy affect their already high exposures?

4-14/ Section 4.3.2 Would new target areas in the expansion, being in a more wooded environment than the existing range, increase fire risk during periods of high forest fire conditions? The last paragraph, sentence 2, "optimum conditions": Would the wooded areas near the new targets be less than optimum for fire control, especially with aircraft using flares, tracers and spotting charges?

4-15/ 1 (and Table 4-3) The footprints shown are all for BDU-33; what about footprints for heavier bombs, 500 pounds to 2,000 pounds? Would their footprints be smaller? Also, in Table 4-3 do the "hard targets" include frozen ground and metal objects like a truck? What differentiates "hard from soft" targets?

4-17/ Section 4.3.3 Flight restrictions that have not been adopted to avoid key migratory bird staging areas in the Volk West MOA (Reference page 2 of September 26, 1996 letter to Major Jeff Moore) indicates that these areas will not be avoided in other MOA's. Therefore, without adequate

RESPONSES TO COMMENTS

Response to Comment No. 126

Noise modeling included all aircraft using the range, performing all anticipated maneuvers. Therefore, defined strafing and bombing tracks were identified and described whenever possible, and applicable numbers of aircraft were assigned to those tracks. However, noise modeling is limited to aircraft noise (i.e., noise from the engine and aerodynamic noise associated with the aircraft's passage through the air). There are no approved models to assess the noise resulting from the airborne firing of 20 mm and 30mm ammunition. In regard to training ordnance, the gunpowder used in the spotting charges is approximately equivalent to that contained in one 10 gauge shotgun shell. Since the charge is contained in the housing of the training ordnance, any noise resulting from its detonation is considered insignificant.

Response to Comment No. 127

Altitudes used vary by each aircraft type, the airspace used, and the type training performed. Unless constrained by the configuration of the airspace, altitudes range from 500 feet to greater than 10,000 feet, and the aircraft are distributed throughout those altitude ranges by ratios based on operational experience.

Response to Comment No. 128

Data on Sound Exposure Levels (SEL) and maximum sound levels (Lmax) created by F-16 aircraft at varying distances have been added to the EIS. At the minimum altitude Air Force aircraft fly, no noise levels are such that they would cause hearing damage.

Response to Comment No. 129

No specific analyses of noise effects in the EIS base their assumptions on any specific building noise attenuation. In the Noise Appendix (see Appendix F), the assessment of an estimated 20 dB attenuation resulting from being indoors is identified as "conservative", and is only used as a clarifying example.

Response to Comment No. 130

See response to Comment No. 128.

RESPONSES TO COMMENTS

Response to Comment No. 131

Fire risk and other ground safety concerns are important considerations during the planning, development, and construction of targets. Impact areas are developed to minimize risk to the maximum extent practicable. The "optimum conditions" terminology highlighted, in context, is a broad descriptive statement of the conditions that would be desirable on the "ideal tactical range." The use of flares, hot spot spotting charges, and tracers is curtailed during periods of extreme fire risk (see EIS Subsection 3.3.1.1).

Response to Comment No. 132

The safety footprints presented in the EIS were simply intended to illustrate variances between aircraft and delivery profiles. In general, most footprints associated with inert general purpose bombs are somewhat larger than those associated with BDU-33s. Whether a target is classified as "hard" or "soft" is a function of the target. A hard target is one that would be likely to cause a ricochet (e.g., a tank, or a vehicle with drive-train components still installed). A soft target is one that would not be likely to cause a ricochet (e.g., a plywood mock-up). However, regardless of whether the target itself is hard or soft, if the target area in which it is situated is very hard ground, or rocks, then the target must be considered hard.

Response to Comment No. 133

The EIS states that potential impacts to wildlife would exist, but would generally be low with the implementation of specific mitigation measures. Comments and concerns from the DNR will be taken into consideration in the development of mitigation measures to minimize potential impacts to wildlife and other resources.

Also, see response to Comment No. 131.

Response to Comment No. 134

Only 37 acres of open water wetlands are located within the proposed expansion area. This represents a minor amount of wetlands in the region. Bird airstrikes are analyzed in Subsection 4.3.3.

Response to Comment No. 135

The text of the EIS has been modified to incorporate this information.

avoidance measures, the risk of bird strikes will increase. There are unavoidable and avoidable adverse impacts associated with the proposed action. The fire hazards associated with the use of flares within the airspace is not addressed.

4-21/ 1 Are there more open water wetlands and beaver impoundments in the expansion area than the existing range? If so, might more water-oriented migratory bird strikes be expected in the expanded range area than the existing range area?

4-22/ 1 Again, ANG's answers to our previous question of environmental effects from target batteries, fuel and other fluids, and possibly practices to render debris (unfired spotting charges) harmless should be related to the conclusion "would only involve aircraft crashes".

4-22/ last Are the gallons of diesel fuel and unleaded gasoline figures listed per year? What are "AST"s?

4-23/ 1 What is the status of this plan? The sentence should read, "to demonstrate whether contamination has taken place...." It presently sounds like the contamination conclusion has already been made.

4-24/ section 4.5.1.3 As mentioned previously, it is impossible to make such conclusions until specific construction plans are set forth. There should be more soil erosion control measures planned than those listed. In the last paragraph (continuing onto the top of page 4-25), flushing of soil particles into the numerous streams of the area needs to be avoided or minimized; this should be addressed in this section.

4-24/ last This section states that soil disruption is minor, and erosion concerns are minimal due to the forested nature of the area. However on page 4-32, it states that up to 2545 acres would be developed with tree clearing and grading.

4-26/ Section 4.6.1.1 Why isn't there a bullet for wetlands filled for construction?

4-26/ Section 4.6.1.2 How specific was the "identification of locations"? Where can the details be found? Since the various construction facilities have not been located for the expansion area, how was this done?

4-26/ Section 4.6.1.3 Here it states that the various construction "...may cause soil erosion, vegetation loss...", but in other sections the DEIS says vegetation will be lost.

4-26/ Section 4.6.2 Here the DEIS states, "Construction activities...would not adversely impact water resources in the area." Wetlands are also water resources. Also, no specific information is provided whether or where ANG might alter the locations of water courses.

4-27/ 1 DEIS states that modification of drainages "might occur unless culverts...are installed...." What is the proposed design?

4-27/4 A crash could have an impact on groundwater resources.

RESPONSES TO COMMENTS

Response to Comment No. 136

An "AST" is the acronym for above-ground storage tank. The quantities listed are for annual use. The EIS text has been modified to clarify this information.

Response to Comment No. 137

The spill plan for the Hardwood Range was updated in January 1996.

Response to Comment No. 138

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 139

As indicated in Subsection 4.7.2.1, although specific site development plans have not been developed for facilities in the range expansion area, some estimates can be made for land and tree clearing requirements. To reduce potential costs, the landing zone will most likely be located on an existing roadway with an additional area (approximately 100 total acres) added on either side for wing clearance. The landing zone area will be used as the drop zone. There are currently no plans to remove trees and alter large areas in the proposed expansion area for new target locations, because enough clearings and roads currently exist to meet most requirements. The targets will be relatively small and, using the existing range as a model, the disturbance for the actual tactical targets will probably be limited to less than 100 acres. This would bring the total area disturbed under the proposal for land and tree clearing to approximately 200 acres.

Subsection 4.5.2.3 indicates that use of the tactical target complex could increase soil erosion in small localized areas caused by dropping target munitions, potentially causing impacts to water quality. All impacts to soils would be mitigated and managed through the use of Best Management Practices (BMPs) to stabilize and minimize soil movement at the areas of disturbance.

RESPONSES TO COMMENTS

Response to Comment No. 140

The bullet list in Subsection 4.6.1.1 itemizes primary issues for water resources. The third itemized bullet states "The effects of bombing and construction on wetlands". Construction activities would include draining and filling that may be required to construct site facilities. Subsection 4.5.2.4 discloses impacts to wetlands.

The ANG firmly commits to not impact wetlands in development of the proposed expansion area; however, Executive Order 11990 which calls for "no net loss of wetlands" does not preclude the development of projects within a wetland as long as no practicable alternatives exist and that the proposal includes all practicable measures to avoid wetlands impacts. Assuming the expansion is approved, the proponent would be required to obtain an individual Clean Water Act Section 404 permit for any activities occurring within wetlands or other waters of the United States. Issuance of a Section 404 permit requires a demonstration that the Section 404 (b)(1) Guidelines have been followed. The Guidelines require that the project avoids and minimizes impacts to wetlands to the extent possible and provide mitigation for unavoidable impacts. Once specific designs and locations for the landing zone, drop zone, and target area(s) are available, the ANG will conduct jurisdictional wetland delineations to facilitate the assessment of specific project components (and alternatives) on wetland resources, as applicable. Subsection 4.6.2.4 of the EIS discusses requirements under Executive Order 11990, Protection of Wetlands, Section 404 of the Clean Water Act, and Chapter NR 299 of the Wisconsin Administrative Code.

Response to Comment No. 141

The ANG has not determined the specific location for new facilities within the expansion area; however, the ANG firmly commits to not impact wetlands in development of the proposed expansion area. Subsection 3.6.1.4 has been expanded to include more information on the wetlands occurring in the range expansion area. This discussion includes an approximation of acreage by wetland type and a discussion of functions and values provided by each wetland type.

RESPONSES TO COMMENTS

Response to Comment No. 142

Subsection 4.6.1.3 summarizes potential impacts that could occur and may affect water resources. Impacts to vegetation resources are specified in Subsection 4.8.2.1.

Response to Comment No. 143

The EIS text for Subsection 4.6.2 has been clarified to indicate that impacts to wetlands would not occur, and adverse impacts to other surface water and groundwater resources are not expected. The ANG has not determined the specific locations for new facilities within the expansion area, therefore, a specific quantitative discussion of impacts to water courses and drainage is not possible for the EIS. Subsection 4.5.2.1 discusses expected impacts to surface water drainage patterns that could potentially occur due to construction activities. Culverts, bridges, or other drainage structures would be used to minimize affects to local drainage patterns, as required.

Response to Comment No. 144

See response to Comment No. 143, above.

Response to Comment No. 145

Potential sources of pollutants to surface and groundwater in the range expansion area are from aircraft mishaps (i.e. crashes) and from munitions. These sources and the fate of potential pollutants are discussed in Subsections 3.3.3.1 (Aircraft Mishaps), 3.3.4.1 (Munitions Use and Handling) and 3.4.1 (Hazardous Materials and Solid Waste). Potential impacts to both surface and groundwater resources and water quality are discussed in Subsections 4.6.2.1, 4.6.2.2 and 4.6.2.3. Based on the information provided in Section 3 of the EIS, adverse impacts to surface and groundwater quality or drinking water supplies would not be expected. The EIS text for Subsections 4.5.2.3 (Water Quality) was modified to reference the identified appropriate sections in Section 3 and discuss conclusions regarding groundwater quality.

4-27/ Section 4.6.2.4 (and 4.6.2.5) The DEIS states that although impacts to wetlands and floodplains are difficult to predict, it is anticipated that these impacts will be minimal given the regulatory protection afforded these resources. The state and federal regulations that pertain to wetlands and floodplains only allow activities that will have insignificant impacts to the these resources. If the impacts associated with the project are not minimal, then a project can not be permitted. Thus, it seems illogical to conclude that a project will have minimal impacts because environmental protection regulations would prevent it; these regulations may prevent the project from being completed as proposed.

Both of these sections assert that impacts to floodplains and wetlands will have relatively little impact due to the presence of similar wetlands, floodway and floodfringe that will continue to function unimpeded at the regional level. It is our opinion that if the EIS is going to maintain this line of thought, it will also need to provide additional information on the region's land use patterns and trends, and analyze the cumulative impacts of repeated similar actions that eliminate wetlands and floodplains bit by bit.

4-28/ 1 Again, the EIS must include an evaluation of impacts based on what is on the proposed sites for construction versus the state of those resources during and after the construction work.

4-28/ 2 What mitigative measures are proposed? It may be difficult to specify until you have determined the number of acres to be filled. The DEIS should at least identify proposed wetland compensatory mitigation sites.

4-29/ Section 4.6.4 This section should include a discussion of the expected magnitude of the impacts. Mention should be made to the likely taking of endangered resources (specifically state listed species) that utilize the wetland and water resources in the area.

4-30/ 3 The last sentence is incorrect. Wisconsin does have a PSD Class I Area, the Rainbow Lake Class I Wilderness Area in Bayfield County.

4-31/ Section 4.7.1.2 The methodology to determine the significance of air quality impacts need to be based on both standards and existing conditions. Air pollutants within most of this area is minimal, increased flights will increase emissions and degrade current air quality. Due to the remoteness of this area, air quality impacts could be significant.

4-32/ 3 If tree clearing and grading are to be done, this can cause emissions of particulates. In addition, the trees and brush may have to be burned in brush piles. What will be done with debris from the clearing operations. WDNR Bureau of Air Management would like to have the construction phase modeled to ensure that NAAQS are not exceeded beyond the property boundary during the construction phase.

4-39/ Section 4.8.1.1 State law (s. 29.415) prohibits the taking in Wisconsin of animals listed as State-Endangered or State-Threatened and the taking of plants listed as State-Endangered or State-Threatened on publicly owned lands. Authorization to take listed species while undertaking an otherwise legal activity may be granted by the Department if certain conditions are met. The DNR believes that the ANG is subject to this law and will need to enter into consultation with the DNR to seek authorization to incidentally take any listed species.

RESPONSES TO COMMENTS

Response to Comment No. 146

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 147

See response to Comment No. 1.

Response to Comment No. 148

See response to Comment No. 140.

Response to Comment No. 149

See response to Comment No. 139.

Response to Comment No. 150

According to 40 CFR 81, Subpart D, the USEPA has not designated the Rainbow Lake Class I Wilderness Area as a "Mandatory Class I Federal Area Where Visibility is an Important Value." According to Mr. Ralph Patterson of the Air Management Division of the Wisconsin Department of Natural Resources, the Rainbow Lake Class I Wilderness Area has been designated as a "non-visibility-related" PSD Class I Area. Mr. Patterson could not provide a reference to the Federal regulation that includes this designation, but he stated that Rainbow Lake was one of two non-visibility areas in the country. The other area is in Florida. Confirmation that the Rainbow Lake Wilderness Area is, in fact, a Class I Wilderness Area may be found in Reference C.

The evaluation in the EIS of the potential significance of impacts to PSD Class I Areas is accomplished by comparing the concentrations of air pollutants versus the PSD Class I increments. As shown in Table 4-14, the criteria pollutant concentrations predicted by the MAIIS model for the affected airspace do not exceed 4 percent of the PSD Class I increments or 0.1 percent of the NAAQS. Therefore, the potential impacts from the proposed action would not be significant, even if the affected area were located within a PSD Class I Area.

RESPONSES TO COMMENTS

Response to Comment No. 151

The significance of air quality impacts is determined by comparing the estimated air pollutant concentrations from a potential maximum impact scenario with existing PSD Class I and NAAQS increments for regulated pollutants. The area within the affected airspace is in attainment of NAAQS, indicating that air pollution is indeed minimal. The significance of air quality impacts is evaluated by comparing predicted air pollutant concentrations versus PSD Class I increments, which are designed to prevent significant deterioration of air quality within attainment areas.

Response to Comment No. 152

The debris from tree clearing operations will not be burned. This has been added to the text of the EIS.

Response to Comment No. 153

Incidental take for Wisconsin State - endangered or threatened plant and wildlife species is highly unlikely under the Proposed Action. The ANG is currently coordinating with the USFWS regarding potential effects of the Proposed Action on Federally-listed species. Similarly, the ANG will seek WDNR concurrence with its determinations of effect for State-listed species prior to implementation of the Proposed Action.

4-39/ Section 4.8.1.2 Again, the analysis presented is only of marginal use because the majority of the inventories requested by the DNR, particularly for rare species, were not conducted. Without knowing what occurs within the impact area, particularly the existing Hardwood Range and proposed expansion area (the areas where direct impacts and noise levels will be highest), it is our belief that an adequate analysis cannot be completed.

154

4-40/ Section 4.8.1.3 As this section states, results from studies on the impacts of loud noises on animals vary widely. For many species groups, the effects of noise are largely unknown. An overall conclusion that can be drawn from the studies presented is that some noises adversely affect some species some of the time. Although the DEIS presents some of the current literature, it does not present a very clear picture of what the impacts to different resources will be, nor the different impacts that different alternatives will have on these resources. It would be appropriate to present the potential noise impacts based upon the most sensitive species, places and times of the year. For example, when they are present, trumpeter swans appear to be particularly sensitive to noises. Similarly, the nearby state and federal wildlife areas host large numbers of waterfowl during migration periods. The impacts could be analyzed more effectively if the general locations of these sensitive resources should be depicted along with the proposed noise "zones."

155

4-40/ section 4.8.1.3 The literature cited indicates uncertainty on the long-term effects of military overflights on wildlife populations. Therefore, it is unreasonable to draw the conclusion that there will be low impacts to wildlife. Furthermore, the literature cited appears to be selective to support a pre-conceived finding of low impacts. For example, numerous studies have been conducted on the subject matter to address the impacts on ungulates during sensitive time periods (i.e. pre- and post-birthing). These studies indicate that ungulates are most sensitive to aircraft disturbance during this time period. This disturbance can result in a stressful condition resulting in smaller offspring, aborted fetuses or premature births. In addition, it is recognized that the response of wildlife species to low flying aircraft depends on the degree to which they are exposed. Wildlife using large open areas (grasslands, sedge meadows, marshes etc.) tend to be more susceptible to adverse impacts from overflights compared to wildlife using habitat with dense cover. Since this area has large open expanses, wildlife impacts would tend to be greater.

156

Many wildlife species become accustomed to low-flying aircraft, as shown by the occurrence of some wildlife species at some airports. However, no studies have been conducted to determine whether wildlife population density is lower near airports or under other flight paths than in other areas of similar habitat exposed to less aircraft activity. Therefore, the occurrence of some wildlife at airports does not necessarily show that low-flying aircraft would have no effect on wildlife population densities in more remote areas. Furthermore, sensitive habitat in this area which is most susceptible to the proposed action, contains migratory birds reared in northern latitudes where they are unlikely to become accustomed to this type of disturbance.

In spite of some studies that indicate an apparent tolerance of some resident wildlife to low-level overflights, there remains the uncertainty of whether noise repeated over the long-term would cause an area to be less attractive to wildlife, resulting in a reduced population after several years. For example, two previously occupied bald eagle nest sites located in the Volk West MOA have not been used for several years. Both of these sites are adjacent to large open flowages. These areas are used extensively for military overflights and are close to VR-1616. Both of these nest locations have been abandoned despite the availability of excellent nesting trees and abundant food supplies. These sites

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RESPONSES TO COMMENTS

Response to Comment No. 154

Following guidelines for the preparation of EISs, impact analyses were based on the best available information regarding the biological resources. For Hardwood Range and the proposed expansion area, surveys were conducted for selected rare species. Information about sensitive wildlife in the Falls 1, Falls 2, and Volk South MOAs was obtained from existing WDNR and USGS databases, as well as from previous National Guard surveys. Potential impacts described in Subsection 4.8 were evaluated based on appropriate studies in the scientific literature.

Response to Comment No. 155

The best available information indicates that the effects of aircraft overflights on wildlife, including trumpeter swans (i.e., Henson and Grant 1991), are generally short-term and minor. Short-term responses such as alert postures have no identifiable mechanism for long-term effects such as reduced reproduction, increased mortality, or habitat abandonment. Noise impact studies from a variety of military use areas were considered in the impact analysis process. Please refer to Subsection 4.8.1.3 of the EIS for further discussion of noise impacts to wildlife.

Response to Comment No. 156

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 157

Most studies of aircraft effects on raptors indicate that raptor responses to aircraft and other types of noise are generally short-term and minor, with no mechanism for long-term impact. Studies on peregrine falcons (Ellis et al. 1991), bald eagles (Grubb and King 1991) spotted owls (Johnson and Reynolds 1996, Delaney et al. 1997), and ferruginous hawks (White and Thurow 1985) fail to show reproductive or other effects with long-term consequences due to exposure to noise. Grubb and King (1991) and Grubb and Bowerman (1997) found that military jets elicited a response from breeding bald eagles much less often than helicopters, foot traffic, or boat traffic. It is possible that the flush response reported by the commentor was elicited by military jets or by other stimuli, including vehicles, boats, potential predators, or persons on foot. Attributing such a response to any individual source is not possible without a controlled study.

In addition, many of the birds in the studies cited above had not previously been exposed to noise disturbances similar to those studied. Wildlife within the ROI for the proposed action have already been exposed to aircraft overflights. The scientific literature indicates that populations of wild animals previously exposed to aircraft overflights are likely to be habituated to such disturbances, and there is no evidence that habituated animals exhibit any effects for aircraft approaches at the distances associated with the Proposed Action.

have been abandoned despite a general increase in the statewide nesting bald eagle population. On May 9, 1993 at 2:16 PM, two DNR Technicians observed several military aircraft flying at low-levels directly over the Meadow Valley Flowage and flushed two adult Bald Eagles off a roosting area near the last active nest site.

4-41/ top Reference to one study that was not conducted in Wisconsin as a basis for conclusion seems inappropriate. Several studies, including some in the expansion area should be done to verify actual responses of raptors to overflights. The last sentence uses the phrase "it is not known" which seems to agree that more work is needed before conclusions can be reached.

4-43/ 3 The DEIS reports the observations of Dannenberg (military personnel) but does not include the observations of the two biologists (Zeckmeister and Johnson). Based on the field notes recorded at the site and the subsequent documentation forwarded to the Air National Guard, the "...swans were most impacted by the B-52 bombers when they flew directly over the Gallagher Flowage. There were minimal impacts on the swans when the B-52's flew 2-4 miles north (emphasis added) of the South Gallagher Flowage at mid-to-maximum altitude." The DEIS states that "in seven of eight overflights, the swans exhibited either no response or a slight response...to the stimulus." This finding is inaccurate based on the original field notes and subsequent documentation made by the two biologists, who are trained and experienced with recognizing Trumpeter Swan behavior. On September 11, 1992 (one day after the aforementioned exercise) additional low-level overflights occurred over this same area and resulted in additional frightened behavioral reactions. Based on the results of this "controlled" exercise, recommended flight restrictions were forwarded to the Air National Guard on October 9, 1992 to avoid sensitive areas like the Gallagher Flowage where rare and endangered species exist. These recommendations were not implemented (References: October 13, 1995 and September 26, 1996 letters from DNR to Major Jeff Moore).

4-43/ 4 What specific measures will the ANG take to avoid the described disturbance of waterfowl?

4-45/ last Again, where are the figures on the numbers of acres of each plant community type to be affected? This paragraph also states that "the level of impact would depend on several factors...." Can the ANG estimate the level of impact based on expected uses of the range?

4-46/ 3 Is this coordination only for Karner Blue butterflies, or are other species involved?

4-47/ 1 Does the 53 dB include aircraft machine guns and cannons? In sentence 3, what specifically are the 1.2 daily noise events that would exceed the 65 dB?

4-47/ 3 The conclusion that noise events would have a low impact on wildlife is conjecture, not reflecting pages 4-40 through 4-45 which indicate specific disturbance thresholds on behavior or basic life functions is unknown.

4-48/ 1 Sentence 1 says "could"; paragraph 3, sentence 1 says "could"; and paragraph 5, sentence 1 says "would". These do not match. The "would" is not appropriate if the "could's" are not fully implemented. There have been problems on Necedah Wildlife Refuge and Sandhill Wildlife Area. In Paragraph 2, last sentence, it is not appropriate to conclude that "...potential impacts...would ...continue to be negligible."

RESPONSES TO COMMENTS

Response to Comment No. 158

Subsection 4.8 of this EIS discusses noise impacts to raptors and other wildlife. Although few long-term studies of noise effects on raptors have been conducted, the many studies of short-term effects of subsonic and supersonic noise have generally failed to identify the causes through which long-term, population-level impacts may result. These such effects would include such factors as reduced reproductive success, increased mortality, or reduced survival.

Response to Comment No. 159

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 160

In general, ANG pilots are briefed routinely concerning known areas of waterfowl concentrations or migrations. Avoidance criteria is established based upon types of waterfowl in the area and their known habitats. This is an on-going activity at all ANG locations since safety is the ANG's most important concern for not only the aircrews but for persons and wildlife that may be impacted by flying activities.

Response to Comment No. 161

Specific locations of targets and other range facilities would be developed following approval of the Proposed Action and would avoid any impacts to wetlands and other sensitive habitats.

Response to Comment No. 162

Coordination with the USFWS is ongoing and will continue, as appropriate, prior to implementation of the proposal, as required by Section 7 of the Endangered Species Act. At this time, the USFWS has determined that it is premature to prepare a biological assessment.

Response to Comment No. 163

The noise modeling results are for aircraft operations and do not include machine gun and cannon noise. The 1.2 daily noise events mean that every 5 days there will be an estimated 6 noise events that would have an SEL greater than 65 dB.

Response to Comment No. 164

See response to Comment No. 158.

Response to Comment No. 165

The text of the EIS has been changed. Prior to implementation of the Proposed Action, the ANG will coordinate with the USFWS and DNR to address important sensitive wildlife areas and develop avoidance criteria for these areas.

RESPONSES TO COMMENTS

4-48/ section 4.8.5 Isn't the no action alternative for the MOA's a return to the previously assessed levels of usage?

166

4-48/ section 4.8.6 As a way of minimizing potential disturbances, it is suggested that flights could be diverted 500-1500 feet from known nests and staging. This distance is considerably shorter than what the USFWS recommends, as well as the distance that adverse impacts were noted in Section 4.8.1.3. The recommendations provided by the USFWS are currently not followed by the ANG within the existing MOA's surrounding the Hardwood Range. For example, low-level flights occurred over a significant migratory bird staging area in the Volk West MOA on September 25, 1996 at 2:46 PM. This was confirmed in a letter dated October 25, 1996 from Lt. Col. Gunther Neumann (WIANG) to the DNR. The seasonal flight restriction referred to in this correspondence related to trumpeter swan production but not migratory bird staging periods. The September 25, 1996 flights occurred during high concentrations of migratory birds. Military overflights were apparently not restricted during this time period.

167

Critical disturbance periods to be avoided for migratory birds in this area are from March 15 to June 1 and from September 15 to November 15. Large open marsh areas that are critical migratory staging areas need to be avoided at low and medium altitudes. This recommendation is consistent with other U.S. Air Force low-level training areas in central Nevada and Alaska. This is especially significant in areas where most of the land under a MOA is designated recreation and wildlife lands.

168

Mitigation measures need to identify sensitive areas within the MOA's with specific coordinates and describe seasonal and altitude restrictions. For example, include specific coordinates for migratory bird staging areas, nesting locations for rare, endangered, threatened, and species of concern. Mitigation measures need to include a process to report and follow-up on instances of pilot deviations from the avoidance measures.

169

4-49/ Section 4.8.7 It is stated that localized populations of rare species may be disturbed in the proposed expansion area. Again, without adequate surveys of endangered resources occurring on the property, the level and nature of the impacts cannot be evaluated. It is probable that some localized populations of rare species would be destroyed, rather than disturbed, by the expansion of the bombing range. "Small amounts of vegetation" is too vague; some estimated acreages are appropriate.

170

4-49/ 2. Since impacts to biological resources from existing or proposed air space utilization is unknown, it can't be concluded that there are no unavoidable adverse impacts.

171

4-59/ 1 Loss of forestry land use should be included as a bullet.

172

4-60/ Table 4-16 This table provides noise annoyance analysis for residential land uses only. It is likely that the attitude toward noise would likely be less tolerance in most rural and public use areas, which is the predominant land use underlying the MOA's and MTR's. Also, attachment 2 shows substantial less tolerance to noise than table 4-16 because it also includes an "annoyed" range. Furthermore, page 4-61, paragraph 2 says noise impacts on sensitive land use receptors is negligible, whereas table 4-16 indicates slight to moderate.

173

4-61/ 1 What is "limited" tree removal? Quantities (acreages, cords, etc.) of tree removal should be

174

Response to Comment No. 166

The No-Action Alternative is operating at previously assessed sortie levels.

Response to Comment No. 167

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 168

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 169

Because of the potential for loss of a pilot's life and the high cost of modern military aircraft, avoidance of collisions with birds is extremely important to the ANG. The potential for a bird-aircraft strike would not change significantly under this proposal. Training associated with the proposal will continue to encompass the same seasonally adjusted bird avoidance procedures associated with bird migration corridors as are utilized currently with the existing airspace. Due to the fact that bird strikes are rare in existing airspace associated with the Hardwood Range, the likelihood of future bird-aircraft strikes under any of the alternatives would be expected to be low.

The USAF has established a Bird/Aircraft Strike Hazard (BASH) Team to implement procedures to prevent and reduce the threat of bird/aircraft strikes, and to investigate and track any bird strikes that occur. In addition, each USAF/ANG base or flying unit is required to establish a BASH program to minimize the risk of bird strikes both at the base airfield and in airspace training routes for the unit. The USAF BASH Team assists each base or flying unit by providing Bird Avoidance Model (BAM) graphs. These graphs estimate the relative bird strike risk for flying along a specific low-level route or operations area. The model is developed on the basis of waterfowl and raptor migration and concentration data. The BAM graph depicts the severity of the bird strike hazard at a particular time of day, month, and segment of a low-level route. This information is used by the flying unit to determine the optimum route schedule and avoidance measures to be taken to prevent bird/aircraft strikes. In addition, the unit publishes Notices to Airmen (NOTAM) to alert transient aircrews to specific bird migration hazards, activity periods, and avoidance procedures.

RESPONSES TO COMMENTS

Response to Comment No. 170

Following guidelines for the preparation of EISs, impact analysis was based on the best available information regarding the biological resources. For Hardwood Range and the proposed expansion area, surveys were conducted for selected rare species. Specific locations of targets and other range facilities would be developed following approval of the proposal and would minimize potential impacts to sensitive habitats, as much as practicable.

Response to Comment No. 171

The best information currently available indicate that the effects of aircraft overflights on wildlife and livestock are generally short-term and minor. However, the National Guard is sensitive to wildlife managers' concerns. Prior to implementation of the proposed action, the National Guard will coordinate with the USFWS and DNR to address identified sensitive wildlife areas and develop avoidance criteria for these areas. With implementation of these potential mitigating actions, unavoidable adverse impacts would be negligible.

Response to Comment No. 172

Loss of forest lands is shown in the last bullet.

Response to Comment No. 173

Table 4-2 profiles information from well studied noise impacts to people from aircraft operations. It can not be assumed that mostly rural areas, where aircraft noise may be an infrequent event, would be less tolerant. The "average community reaction" is slight to moderate at the 55 dB and below level and thus the impact is considered negligible.

Response to Comment No. 174

Exact quantities for tree removal (in acreage or cords) and vegetation removal can not be determined at this time. A landing zone would be long but not wide. Some target locations would be purposely located within vegetation rather than in a cleared area. Approximations of tree and vegetation removal would generally be expected to be less than 10 percent of the entire range expansion area. Changes to EIS text rewording "may" to "would" have been adopted.

RESPONSES TO COMMENTS

approximated. Same comment for language about loss of "some" vegetation and habitat. In the second to last sentence, it states the access to the various ground based resources listed "may be periodically affected". This should be stated as would be periodically affected. } 175

4-61/ section 4.10.2 This section is confusing because the analysis seems to focus only on noise impacts to land uses and resources, yet the conclusions seem broader than that. } 176

4-62/ 1 We disagree that the proposed action will have limited impacts on hunters, other recreational uses, and forestry uses of the land. "Appropriate operational and safety parameters" needs to be defined. What amounts of lands would be unavailable to all types of hunters for what times of year? What impact would noise have on the quality of hunting experience? } 177

We disagree that "forestry activities would continue to be compatible..." based on current experience at the existing range. As recognized in other parts of the EIS, there will be metal fragments in target area trees, making them unmarketable. Safety is a major concern for Juneau County in planning timbering activities on range lands. The EIS should discuss how forestry practices have been impacted by the existing range. What will be the impacts to Juneau County forestry if the target area is moved such that a new safety zone footprint makes different forest areas unavailable for harvest? } 178

4-62/2 What "changes to the banks of navigable waters..." are proposed? What are the impacts of such changes to the stream, the biotic resources, water quality, etc.? } 179

4-62/3 Where are the structures that will need removal? } 180

4-62/ 4 The DEIS states that impacts to transportation routes would be negligible and the only county road impacted is Batterman Road (approx. 4 miles of Batterman Rd. runs through the center of proposed expansion). Later on page 4-62, the DEIS reports that 13 miles of road will be closed. What impact will there be on County Line Road, which lies between the existing range and the proposed expansion area? } 181

4-63/ 1&3 While ANG may claim minimum altitude restrictions are placed over sensitive land use areas, our observations demonstrate such restrictions are commonly violated. Thus, we disagree with paragraph 3 that noise impacts on sensitive land use areas are now or would be negligible with increased utilization. } 182

4-63/ 2,3,4 The DEIS states 10% of the sorties would occur at night, that noise would be negligible and adverse impacts on land use of the area are not expected to occur. Did the ANG consider the potential effects of aircraft noise at night when people are trying to sleep, particularly in warmer months when their windows are open? } 183

4-63/ 5 Same comment as 4-62/1. This conclusion does not accurately represent the impact to recreational and forestry use of the expansion area. Again, the DEIS should explicitly explain expected recreation and forestry use based on the real experiences at the existing range. } 184

4-65/ 1&2 More specific details should be provided on locations and altitudes involved. Since negative impacts to wildlife had been noted in the past, the "no impacts" conclusion is faulty. In paragraph 2, sentence 2, "could" should be replaced with "will" or "would". } 185

Response to Comment No. 175

See response to Comment No. 174.

Response to Comment No. 176

The range expansion area and Restricted Airspace R-6904B have the same dimensions and apply to the same area of land. Land use impacts, by definition, is a fairly broad term that can embrace other resource areas.

Response to Comment No. 177

Hunting activities, as well as other compatible recreational and forestry uses of the expansion area, would be subject to appropriate operational and safety parameters that would ensure no person were on the property when they could be in danger from training activities at the range. Hunting would not be allowed on the range during training operations, consequently, no impact on the quality of the hunting experience would be possible from the noise from training operations.

Response to Comment No. 178

Trees affected by metal fragments will represent only a fraction of the total land area of the range expansion. Those areas unaffected will continue to be marketable. Also, see response to Comment No. 177.

Response to Comment No. 179

Comment noted. Text changed to clarify relevant information.

Response to Comment No. 180

See response to Comment No. 1.

Response to Comment No. 181

Batterman Road is presently plowed in the winter and kept open to local traffic year round. County Line Road (1st Street) in the area that would be between the old and new range property is a generally unimproved dirt road that is typically impassable in wet conditions, including most of the spring. During the winter, the route is unplowed and used only by snowmobiles. Portions of this route would be closed to vehicle traffic should the range expansion be approved. Other unnamed and/or unmapped dirt roads that may exist in the range expansion area would also be closed to vehicle traffic.

RESPONSES TO COMMENTS

Response to Comment No. 182

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 183

As recognized in Subsection 4.2.1.1 of the EIS, noise is unwanted sound, and it is one of the most common environmental issues associated with aircraft operations. Data on sound levels created by F-16 aircraft at varying distances have been added to the text of the document. None of these sound levels is loud enough to cause physical harm, but some are loud enough to startle or create annoyance. Noise impacts depend not only on the maximum sound level, but also on how long each event lasts and how often the event occurs. Day-Night Average Sound Levels (Ldn and Ldnmr) are used in the noise analysis because they have been found to best reflect the combined effect of these factors. Additional information on the use of cumulative noise metrics is contained in Subsection 3.2 and Appendix F in the EIS.

Response to Comment No. 184

See response to Comment No. 177.

Response to Comment No. 185

Airspace altitudes are discussed in Subsections 3.1 and 4.1. Information on wildlife impacts from noise are discussed in Subsection 4.8. However, information has been added to the EIS in Subsection 4.11 to address the wildlife issue.

RESPONSES TO COMMENTS

4-66/ section 4.11.4 The Wisconsin River should also be added as an area of high visual sensitivity. } 186

4-67/ section 4.12 This section appears to be a summary of the detailed information included in Appendix I. The report in Appendix I was reviewed by the Department and our detailed comments were transmitted in a letter of 8/20/97 from Terry McKnight to Kevin Marek. Our comments on this section and that draft report will not be repeated here. } 187

This section of the DEIS is based on the three acquisition scenarios. One possible scenario is condemnation of the land which isn't addressed. Wood County has publicly stated it will not give up or sell its forest land and intends to challenge this proposal. Condemnation and the impacts of this should be studied. }

4-80/ 1 Based on field observation, the 500' minimum altitude appears to be commonly violated. There is no documented basis for the statement that only a "few flights having maximum sound levels approaching 118 dB." } 188

4-82/ 2 (and 4-83/ 2) Again, are aircraft machine guns and cannons considered? } 189

4-91/ (and Table 4-22) We disagree that cumulative impacts are not identifiable. First, existing air space utilization appears to result in significant numbers of flyovers below 500' AGL and generating significant noise levels and disturbance. Second, since Table 4-22 indicates a 105% VR utilization increase under the proposed action, cumulative significant noise impacts could occur. } 190

4-93/ 2 We continue to question the conclusion that forestry will not be impacted by the project. The last sentence is confusing; for example, won't wetlands filled for certain facilities be lost? } 191

4-95/ section 4.17.1 While detailed instructions may be made available to pilots, this apparently is not sufficient to achieve compliance. It is our understanding that currently there are no operational avoidance measures in place to avoid sensitive habitat areas. How will the listed measures be enforced in the future? This mitigation is also not consistent with the recommendations provided by the USFWS to avoid wildlife sensitive areas. } 192

4-96/ Where are these environmentally sensitive sites that have been identified, or where can this information be found? The DEIS must provide figures to aid in the analysis of the impacts. The bullets lack specifics on what the minimum altitudes will be over these areas and what is considered "appropriate times of the year." Again, adequate implementation and enforcement of these measures is also a concern. } 193

4-97/ last As discussed in our general comments and in several specific comments above, we do not believe the DEIS provides enough information to support the conclusion that there would not be significant adverse environmental effects. } 194

4-98/ 1 Same comment as above in several places. The currently available information mentioned is not enough to make conclusions on the significance of environmental effects expected. Again, the description of mitigation through "standard best management practices procedures" is too vague to support the conclusions of insignificance. The impacts to "surface water resources, including wetlands" are described as "short term", but no specific details are provided in the DEIS to support } 195

Response to Comment No. 186

The comment has been incorporated.

Response to Comment No. 187

The referenced Wisconsin DNR letter dated 8/20/97 has been considered along with other comments provided by the State.

Also, see response to Comment No. 7.

Response to Comment No. 188

Certain training requirements call for pilots to fly below 500 feet above ground level in the immediate target areas associated with the range.

The calculation of a maximum sound levels approaching 118dB for the airspace associated with the Hardwood Range proposal is drawn from the results of the noise modeling accomplished specifically for this EIS.

Response to Comment No. 189

Machine gun and cannon noise has not been modeled.

Response to Comment No. 190

Cumulative impacts are identified and used for this analysis and are based on cumulative sortie numbers that account for overlapping airspace segments. These numbers formed the basis for computer modeling accomplished for the noise analysis.

Response to Comment No. 191

Some changes to forestry practices will likely occur as a result of implementing the proposal. However, forestry activities in the range expansion area will continue. The ANG firmly commits to not impact wetlands in development of the proposed expansion area.

Response to Comment No. 192

Pilot accountability for compliance with procedures to avoid designated sensitive areas is a serious matter to the ANG. If any aircraft are observed violating avoidance procedures for identified sensitive habitat, the public affairs officer at the nearest military installation should be contacted immediately, or call (608) 245-4339.

The ANG has been and will continue to work with the U. S. Fish and Wildlife Service and the Wisconsin Department of Natural Resources to exchange information and study the effects of ANG training activities on sensitive habitat and species of concern. The ANG can adjust training operations should any information become available that would identify potential impacts from operations near sensitive habitat areas.

RESPONSES TO COMMENTS**Response to Comment No. 193**

Sensitive location on the ground, or in areas such as bird flyways, are identified on aeronautical charts used by pilots training at the Hardwood Range. These areas are typically seasonally adjusted, as appropriate.

Response to Comment No. 194

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 195

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

that description.

VI. APPENDIX E

E-2/ 6 What is meant by helicopters "providing airborne support for simulated ground forces"? Does this include firing ordnance? What kinds?

E-4/ Section E.2.2.1 What are the sources of water for the "water barrel drops" that are "drained at the drop zone site"? Could some of this water, if drawn from other surface water sources, have the potential of introducing exotic aquatic organisms such as aquatic plants, mussels, fish, etc., to the range area? What precautions would be taken to prevent this?

VII. APPENDIX F

Appendix F contains substantive information, especially section F.2, on the effects of sound that doesn't appear in the rest of the document and should be considered for placement in the main portion of the Noise sections (e.g., in Sections 2.6, 3.2 and Section 4). For example, Section F.2.5 discusses sleep awakening, but it does not appear in the rest of the document. Recent results from the Federal Interagency Commission on Aircraft Noise (FICAN) should be included in the DEIS. In particular, a report on the "Effects of Aviation Noise on Awakenings from Sleep" (FICAN, June 1997) updates the earlier FICAN 1992 interim dose-response curve on awakening from sleep. A predicted percent of "awakenings" should be added to the discussion in section F.2.5. For example, if our calculations are correct, a 100 dBA Sound Exposure Level event would result in a maximum of about 17.5% of the population being awakened during this event (FICAN 1997 equation: Awakening max. % = $0.0087 * (SEL-30)^{1.79}$). It should be highlighted in the EIS that most sleep disturbance research is done in adults and extrapolation to children can not be done.

F-13/ 5 Are the sound levels reported to protect against sleep interference for dwelling units that have closed windows? If so, summer conditions with open windows should also be considered.

VIII. APPENDIX G

As mentioned under our General comments, many of the recommendations in our letter of 3/22/95 were not followed. As discussed in the specific sections, there are also sections of USFWS's letter of 7/11/95 that did not get adequate response.

IX. APPENDIX I

See our comment for Section 4.12 of the DEIS above.

X. APPENDIX J

State Natural Areas should be included in this list. Why isn't "Volk West MOA" included in this table? Jackson, Clark, Eau Claire county forests should be included. A more complete list of sensitive receptors needs to be developed in cooperation with the Department.

XI. APPENDIX K

Both of Appendices K and L provide interesting background information on the biological resources

Response to Comment No. 196

This exercise provides gunnery training for the helicopter flight crew while minimizing unnecessary risk by only simulating the friendly ground forces.

Ordnance expended by helicopters at Hardwood Range include 20mm, 7.62mm, 50 caliber, and 2.75 rockets. All of these are training ordnance. No live ordnance is allowed on the range.

Response to Comment No. 197

The Hardwood Range Regulations specify that using units have to use potable water sources for drops involving water-weighted objects.

Response to Comment No. 198

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 199

The 20 dB insulation from noise provided by a home's exterior assumes that the windows are closed. Homes of heavier construction using brick, stone, and masonry can increase these levels to 30 dB. Open windows would reduce the sound insulation approximately 15 dB for any home. Homes with open windows in the summer would experience higher sound levels inside the home.

Response to Comment No. 200

All comments received during the scoping process associated with this EIS were considered in the preparation of the document. Such comments, as they relate to the proposal, have helped to improve the EIS process and have become a part of the administrative record for the proposal.

Response to Comment No. 201

See response to Comment No. 119.

Response to Comment No. 202

The EIS text has been revised. Volk West is not a proposed part of the Action, therefore, land uses including County forests are not included as sensitive noise receptors.

Response to Comment No. 203

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

RESPONSES TO COMMENTS

of the general area. Much of the general ecological information presented would be helpful in developing species-specific surveys. Unfortunately, the only surveys conducted were one two-hour flight looking for nesting raptors and surveys for Karner blue butterflies at the existing range. Because the surveys that were requested were not conducted, the DEIS can only state which rare species potentially could occur at the existing Hardwood Range and the proposed expansion area - primarily information that the DNR provided to WIANG's consultants. When we provided the data, we specifically advised WIANG's consultants that the information provided would be inadequate to complete an environmental assessment.

1/1 References to the Juneau County land as county forest subject to s.28.10, Wis. Stats., should be removed since this land has been withdrawn.

3/2 Why don't 500 and 2000 pound bombs require spotting charges? Is it because the amount of dirt kicked up? Is this also true during winter frozen ground conditions?

4/2 This section should state that the lands are currently managed pursuant to s. 28.11, Wis. Stats.

24/ last Here it is recognized that there are extensive wetlands in the area. This fact should have been brought out in wetland discussions in the DEIS. Any developments in this area will impact wetlands.

26/ Table 1 The wetlands classifications in the Hardwood Range and proposed expansion area should be separated.

33/ 2 This discussion on rivers, creeks, and ditches and their importance was not discussed in specific terms as related to planned development of targets and other facilities.

33/ last Two days of ground truthing for the Hardwood Range and expansion area is not an adequate effort for a project of this scope and magnitude.

40/ 2 Are "field observations" actual sampling activity or merely casual observations?

40/ Section 2.5.2.1 (and page 47) Field work for reptiles and amphibians (as well as birds, mammals, fish and invertebrates) should be done in the proposed expansion area and the existing range.

49/ 1 Since appropriate habitats were not thoroughly verified in the field, the exclusions of potential species may not be appropriate.

52/ 1 Northern pike, white sucker, black bullheads, rock bass, smallmouth bass, walleye and some of the minnows in Table 4 are found in lakes as much as, if not more than, streams. Paragraph 2, the possible presence of redbfin shiner in Cranberry Creek and perhaps some of its tributaries warrants fish sampling by ANG consultants in the expansion area waters that may be impacted. This should be done before the final EIS.

52/ Section 2.5.2.3 It should be clarified whether any bird observations were actually made in the proposed expansion area. If not, there should be surveys. If there were, the data should be clearly

Response to Comment No. 204

These comments were utilized in the preparations of the Final Land Use Management Guidelines (See Appendix K).

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RESPONSES TO COMMENTS

identified and separated for the expansion area. The same question applies to 60/ section 2.5.2.4 for Mammals.

60/ Section 2.6 This section states: "Most of the forests contained in the Hardwood Range...are county forests." As previously mentioned, this is incorrect due to the 1997 withdrawal of lands from Juneau County Forest.

63/ 1 The county can apply for loans from the state to develop their forests. To repay the loan, the state collects 20% of the timber sale revenue generated each year in counties with loan balances. In Wood County, there is no outstanding loan.

64/3 The last sentence should be revised to state that while these species are occasionally cut, they are highly sought for papermaking and other wood products. These species do have some importance for the county forest program.

64/ last The lands available for timber harvest should be portrayed on a figure.

65/ 1 In the first line, "found" is incorrect. These are rare species and natural communities that have been recorded.

69/ 2 Again, this incorrectly lists areas in the existing range as part of the Juneau County Forest.

70/2 This list is misleading as it implies that these activities occur on the current range. The EIS should be clear that, for a portion of the range, public access and use is severely limited.

74/ Section 3.1. #2 How would this be accomplished? This assumption appears to contradict the alternatives presented in Appendix I, the Draft SocioEconomic Study.

82/ #2 Again, at least those wetlands located in areas to be impacted by bombing, strafing, and facilities development need to better defined, delineated, and evaluated in the EIS.

84/6 The concept of "multiple-use" has been replaced with "landscape management for biodiversity and by sustainable forestry."

XII. APPENDIX L

2-2/ 1 This section refers to Figure 1-2 which does not exist. Figure 1.2-1 does not show the proposed target areas.

2-2/ last The County Forest land figure is out-of-date since the land was withdrawn in 1997. The Cranberry Rock Forest Unit does not exist.

2-9/ Figure 2-4 needs a legend to explain the various symbols used on the map.

3-8/ Will the recommendation on cutting steep ditch banks be followed in the existing range? In the proposed expansion area?

3-18/ Table 3-4's title lists a "(source:FWS, 1996)". Is this a typo for 1995 or is there another

Response to Comment No. 205

These comments were utilized in the preparation of the Final Biological Survey (See Appendix L).

source not listed in the Bibliography? Also, the title of the table includes "...identified on the proposed expansion area." Were these actual field identifications by the USFWS (as implied), or a list provided by USFWS of species likely to occur?

3-19/ 2 DNR does not have a Forestry Department in Juneau County. This implies that DNR manages lands on Hardwood Range. The DNR Liaison Forester for Juneau County provides technical assistance to the county. We suggest "Juneau County Land, Forestry and Parks Department."

3-26/ 2 "No vegetation sampling occurred in emergent and shrub carr wetlands...." This sampling should be done before the FEIS, including wetland areas that might be impacted, especially by filling or draining.

3-28/ 1 Latin names for jack and red pine are reversed (also in next paragraph). Add that poor quality oak poletimber and sawtimber may also be found in mature pine stands.

3-34/ "Sedges (44%) and litter (43%) are the principle species in the pine understory...." Litter should not be referred to as a species.

3-36/ 2 Same comment as for page 2-2.

3-48/ 1 This is an area that needs additional field work in spring (April-June), and the results should be included in the Final EIS.

3-49 & 3-50/ More details should be provided on the locations of the amphibian, reptile, bird and mammal observations which are listed as "incidental" (and specify which, if any, were in the expansion area). The July 15, 1996, helicopter aerial survey for nesting raptors was done when the leaves were on, which is a poor time. What was the approximate altitude? Why wasn't this done slower than 120 miles an hour? This survey should be redone when the leaves are off, in early to mid-April.

3-50 and 3-52/ Tables 3-7 and 3-8 These lists of potentially occurring species is very incomplete. The lists represent species documented in the area by the NHI and is not an accurate representation of all rare species that "potentially occur" in the general area.

3-51/ Table 3-7 The proposed expansion area information should be separated, and so should Volk Field. Why weren't these surveys conducted as recommended by our 3/22/95 letter?

3-53/ As is the case in several places in the DEIS, particular attention is given to the Karner blue butterfly here. This is understandable given the rarity of this species nationally, but it should not exclude the evaluation of a host of other barrens and savanna species, many of which are considerably rarer than Karner blues in Wisconsin. Also, the rare lepidoptera listed in various places in the DEIS as potentially occurring in the impact area are predominantly composed of barrens and savanna associates. This appears to be at odds with the characterization of the area as primarily composed of wooded uplands (mixed deciduous, pine, and dry oak woodlands) and wetlands (shrub-carr and emergent wetlands). Many rare woodland and wetland-associated lepidoptera occur in Wisconsin.

RESPONSES TO COMMENTS

3-54/ 3 (and 3-56/1) It is stated that the reason that surveys for certain rare invertebrates were not conducted was a result of field personnel not being granted access to the proposed expansion area. Given that a large percentage of the proposed expansion area is owned by Wood County and is open year-round to the public, this statement needs further explanation. The EIS work has been occurring since 1995 so there have been ample times for the sampling to occur at the appropriate flight periods.

3-57/ 1 The western glass lizard is not associated with wetlands, rather it is associated with dry-mesic prairies and savannas.

3-59/ 2 It is assumed, because of high human activity, wolves will be deterred from making extensive use of the Hardwood Range. Over the years wolves have been considered intolerant to human activity, especially around dens and rendezvous sites. The recent expansion of wolves into Central Wisconsin, and other anecdotal recordings, suggest that wolves may be adapting to human activities and disturbances.

Wolves may visit or already exist on the Hardwood Range. Though the expansion area is not within the areas considered good wolf habitat in the state, the land is near good habitat areas and thus may be used by lone wolves or dispersing wolves that are not as picky on habitat quality as pack members. We have received several unconfirmed wolf sightings in and near the Batterman Road area within the expansion area. Wolf tracks and scat have been found off Turkey Track Road also within the expansion area. Yearling male wolf/274 was captured on 8/24/96 and radio collared in the Wildcat pack in Jackson County. Wolf 274 dispersed from his natal pack territory in November and was observed by a DNR employee crossing Hwy 173 at Babcock on December 10, heading south. A private individual reported seeing a collared wolf two miles south of Babcock around the same time. Wolf 274 may have entered the Hardwood Range. Another radio collared wolf, Wolf 275, has been located a number of times in northwestern Juneau County, southwestern Wood County and eastern Jackson County. Our knowledge of wolf usage of the range and proposed expansion area is limited, in part due to restrictions placed on flying in the area where military aircraft are present.

3-59/ 2 The King (1996) reference is not in the literature cited section of the report.

4-3/ Mike Zeckmeister's name and title should be corrected. He is Meadow Valley Sub-Team Supervisor, and is not a fisheries biologist. The same applies to page 5-2, and his location is Babcock, not Finley.

Appendix A (of Appendix L) The lists of fauna should be separated for each of the three areas. Were unidentified specimens collected, photographed or sketched? There is confusion regarding the phrase, "reptiles/birds/mammals of the proposed expansion area..." Are these species that have been recorded at the expansion area, Hardwood Range or Volk Field, recorded near these properties, or species that may likely occur in the area? Also, why are some species that are noted as "observed" assigned an occurrence likelihood of "unlikely"? Appendixes D, E, and F are all missing from Appendix L.

XIII. APPENDIX M (BASH Evaluations)

M-3 through M-8/ Why are there no AGL shown for VR1616 and VR1650, but 150 feet is indicated for VR6904?

Response to Comment No. 206

This information is in the precise form in which it is received from the USAF BASH Team analysis, and was not produced by the authors of the EIS.

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ATTACHMENT 2



State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES

Tommy G. Thompson, Governor
George E. Meyer, Secretary
William H. Smith, Regional Director

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RESPONSES TO COMMENTS

August 20, 1997

Mr. Kevin Marek, ANG/CEVP
13500 Fetchet Avenue
Andrews Air Force Base, MD 20762-5157

SUBJECT: Draft Socioeconomic Study for the Hardwood Range Expansion

Dear Mr. Marek:

Thank you for the opportunity to provide comments on the April 1996 Draft Socioeconomic Study for the Hardwood Range Expansion that we received on June 25, 1997. We understand this document will be included in the complete Draft Environmental Impact Statement (DEIS) for the proposed range expansion. Review of the subject document without knowledge of what else will be covered in the DEIS (and in what context the topics will be addressed) is a bit difficult. The following are our comments on this draft document, and we reserve the right to comment further upon seeing this information in the context of the DEIS.

207

GENERAL COMMENTS

In general the study contains a great deal of useful information; our comments provide recommendations for additional analysis and corrections needed to improve the report.

The study does not appear to consider the entire scope of the socioeconomic impacts of attempting to replace withdrawn County Forest Lands; these impacts could be significant. It should also recognize possible legal requirements for replacement lands if the County Forest Lands were withdrawn. The study does not seem to recognize the public benefits of retaining a large, contiguous block of forest. Obtaining another large block of forest as replacement would be near impossible since the county can only acquire land from willing sellers. Replacement lands would probably have a significant percentage of non-forest acreage which would need to be planted with trees. Possible removal of agriculturally productive land to replace County Forest Land and the potential cost of reforestation should be addressed. There has been significant opposition from local citizens in townships where the county might look for replacement lands.

208

The expected impacts of restrictions placed on recreational use in the proposed expansion area should be described and compared to present conditions. The expected impacts of increased use on

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Response to Comment No. 207

These comments were utilized in the preparation of the Final Socioeconomic Study for the Hardwood Range Expansion (See Appendix I).

Response to Comment No. 208

Additional factors that may affect the acquisition of replacement lands have been discussed. The possible need for reforestation of replacement lands has been identified. Since the location of replacement lands and the resulting amount of reforestation are not known at this time, the cost of reforestation is speculative, and has not been quantified.

Response to Comment No. 209

Additional discussion of non-consumptive use and potential impacts on nearby recreation areas has been added. An estimated per mile cost of relocating snowmobile trails has been added.

RESPONSES TO COMMENTS

nearby public lands due to range expansion are not addressed in enough detail. Current levels of non-consumptive use of the land in the proposed expansion area and the expected increase of non-consumptive use on other nearby public lands need (at least qualitative) discussion. How will current recreational quality be affected on lands available to the public within an hour or so travel of the proposed expansion area? To what extent are trails transiting the proposed expansion area integral to a wider network of trails and what will be the economic impacts of relocation of those trails?

The expected effects on tourism in the surrounding area, including the city of Wisconsin Rapids, need to be addressed in more detail.

Socioeconomic effects of noise associated with airspace actions are not mentioned or cross-referenced to other parts of the Draft Environmental Impact Statement. Considerations such as potential effects of noise on home or property values, land use on adjacent properties and recreational quality of the surrounding public wildlife areas should be evaluated.

The study should clarify that Option 3 ownership would be the State of Wisconsin Department of Military Affairs. There could be some confusion among the public as to which state agency might actually acquire ownership. This clarification should be made throughout the report; it would prevent a lot of questions as to whether "State" means "DNR".

Overall the study appears to give more attention to economic impacts than to social impacts. We recommend discussion of overall recreational and also tribal concerns regarding the use and enjoyment of lands within and adjacent to the proposed expansion area, existence of anti-military sentiments, and how Native American off-reservation treaty rights might be affected. You recently mentioned that some of these issues will be addressed in an EIS section on cultural resources.

In Wisconsin, "Towns" such as Port Edwards, Remington, etc. should not be described as "Townships".

Does "Option 1" include possible Federal condemnation as a means of acquisition, or would that be considered another option not yet mentioned? The socioeconomic impacts of condemnation could be significantly different from the impacts discussed in this study and should be addressed.

We also suggest another option be added to this analysis; that of "No Action," as required for National Environmental Policy Act Environmental Impact Statements.

Comments on Specific Pages of the Socioeconomic Study:

PAGE 1

- Paragraph 4, line 6 - The term "direct" socioeconomic impact needs clarification. "Direct" versus "indirect" are not easily distinguishable in the context used in the report. Direct and indirect socioeconomic impacts should be included.

Response to Comment No. 210

A qualitative discussion of tourism effects for Wisconsin Rapids has been added.

Response to Comment No. 211

Potential noise effects from the proposed expansion are presented in Table 4-1 and Subsection 4.2.3 in the noise section of the EIS.

Response to Comment No. 212

Text has been added to clarify that under Option 3, the owner would be the Wisconsin Department of Military Affairs.

Response to Comment No. 213

Native American concerns are discussed in Subsections 3.9 and 4.9 of the EIS. Recreation is discussed in Land Use Subsections 3.10 and 4.10 and in the Hardwood Range Expansion Socioeconomic Study, which is included as Appendix I. Public comments received on the EIS include expressions of "anti-military sentiment" and other types of views and concerns, all of which are presented in the public comments displayed in Volumes II and III.

Response to Comment No. 214

The word "township" has been replaced by the word "town".

Response to Comment No. 215

Land acquisition through condemnation would have similar socioeconomic effects to the acquisition of land through voluntary purchase and sale. Both would be based on the appraised value of the property and in both cases, relocation costs would be paid by the Federal government, private lands would be taken off the tax rolls once they are owned by the Federal government, and the operation and potential socioeconomic effects of the expanded range would be similar.

Response to Comment No. 216

Socioeconomic effects of the No-Action Alternative are discussed in Subsection 4.12.4.

Response to Comment No. 217

The text has been revised. Both types of effects are included in the study.

RESPONSES TO COMMENTS

PAGE 3

- Table S-1 - Option 1, "Benefit" column - see comments for page 4 below.

3

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PAGE 4

- Paragraph 2, line 5 - Contracts for 200 acres of the 316 acres in Woodland Tax Law and Forest Crop Law programs will expire on December 31, 1997. These 200 acres will go into the Managed Forest Law program on January 1, 1998. Withdrawal payments that the county would receive will be significantly reduced. Another 36 acres of land in the Woodland Tax Law program will expire at the end of 1999. This information should be described consistently throughout the study.
- Paragraph 3, sentence 5, (Option 2) - This statement refers to lower bids for timber due to reduced quality. This is true, but also important is the further reduction in timber revenues due to time restrictions on harvests due to flights; also, since no timber could be harvested near any impact or target areas, timber would only be available from the outside fringe area of the range. Therefore, timber revenues from the proposed expansion area will be reduced by more than indicated in paragraph 5 and also page 5, paragraph 1.

219

220

PAGE 5

- Paragraph 1, line 1 - Payments to local jurisdictions on lands withdrawn from forest tax programs are expected to be minimal by the time land transfers took place. (see comments for page 4)
- Paragraph 1, last sentence - "timber severance revenues" should be "timber stumpage revenues". This revenue would be reduced, as noted in comments for page 4, paragraph 3, sentence 5.
- Paragraph 3 - The socioeconomic impact from the loss of agriculturally productive lands and the potentially substantive investment needed to plant trees on some of the replacement lands need recognition (see comments in the "General Comments" section above, regarding replacement lands).

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222

223

PAGE 10

- Section 3.1.1, paragraph 2 - The information on the Juneau County Forest Land is out of date. The existing Hardwood Range includes ownership of approximately 3,650 acres of Juneau county land and 4,300 acres of State of Wisconsin Department of Military Affairs land. The 3,400 acres of Juneau County Forest Land was withdrawn on February 26, 1997 even though the completed withdrawal is currently being challenged in court. Also, the last sentence of this paragraph states "Juneau County would still own the land..." This may be misleading; sale of the withdrawn Juneau County Forest Land to the military is a possibility that does not seem to be recognized in the study. In line 5, "is" should be "was".

224

PAGE 11

- Figure 3.1-1 - The Juneau County "Community Forest" on the map is out of date (see comments for page 10).

225

PAGE 12

- Section 3.1.3, paragraph 2, line 1 - To what does 11,637 refer? Number of jobs? In line 3, "Three" should be "There".

226

PAGE 14

- Line 11 - The last sentence says "Wood County". It is Juneau County.

227

Response to Comment No. 218

Benefits have been recalculated based on the updated status of acreage within the forest tax programs.

Response to Comment No. 219

Benefits have been recalculated based on the updated status of acreage within the forest tax programs.

Response to Comment No. 220

The discussion of factors affecting timber revenues has been expanded and the estimated reduction in timber revenues, if expansion occurs, has been revised.

Response to Comment No. 221

Payments from forest tax programs have been recalculated based on updated information received from the Wisconsin DNR Bureau of Forestry—Forest Tax Section.

Response to Comment No. 222

The term "timber severance revenues" has been replaced by "timber sale revenues", which is the term recommended by Wood County.

Response to Comment No. 223

Text addressing the possible need for reforestation of replacement lands has been added. The cost of reforestation is not estimated since the acreage of land requiring reforestation is not known.

Response to Comment No. 224

The text in Subsection 3.1.1 has been revised to update the status of the Juneau County Forest Land in the existing Hardwood Range. The sentence addressing continued Juneau County ownership of these lands has been revised to clarify that removal of land from the County Forest Program does not necessitate its sale or disposal. Sale of these lands by Juneau County to the military is not a part of the expansion action that is being considered in this document.

Response to Comment No. 225

The map has been updated to reflect the new boundary of the Juneau County Forest.

Response to Comment No. 226

The statement has been modified by inserting "jobs" after 11,637.

Response to Comment No. 227

"Wood County" has been changed to "Juneau County".

- Section 3.1.6, paragraph 1, lines 4,5 - Juneau County also owns 3,600 acres of land (not County Forest Land). Also, this acreage no longer comprises 23.5 percent of the county's total County Forest Land. } 228

- Section 3.1.6, paragraph 1, lines 9-15 - "CFL" should be omitted in lines 9 and 11 and replaced with "land" and "county" respectively. Also, the County Forest Land withdrawal ~~was~~ approved February 26, 1997 and the Juneau County Forest Plan 1996-2005 ~~was~~ approved by the department on April 22, 1996. } 229

PAGE 15

- Section 3.2.1, paragraph 2 - Meadow Valley Wildlife Area and Necedah National Wildlife Refuge are described as being located within Wood County. They are entirely in Juneau County. } 230

PAGE 16

- Line 4 - "his" should be changed; some of the landowners are women. } 231

PAGE 17

- Section 3.2.3, paragraph 2, - What "region" is being referred to here? } 232

PAGE 22

- Section 3.2.5, paragraph 1, line 9 (continues on pg. 23) - "... and personnel who suppress forest fires on CFL." This sentence should add "... , state lands and private lands outside municipalities." } 233

PAGE 23,24

- Section 3.2.6, paragraph 3 - The description of Wood County's timber value within the proposed expansion area needs to be addressed beyond stumpage value. For instance, manufacturing value for the local economy is usually 20 times the stumpage value. This would equate to \$10,295,940. ($20 \times \$514,797$.) Another economic expression is the person-years of employment from the timber harvested. Each $28 \frac{1}{4}$ cords represents 1 person-year of employment in forest product manufacturing or 1158 person-years ($33,000 \div 28.5$). At \$19,000 per person-year, this method equates to \$22,002,000 in wages per year. Also, see the attached, updated "Hardwood Bombing Range Proposal Expansion Area Wood County Forest Property" table, which should be included in the Socioeconomic Study. This table was prepared jointly by the county and DNR. } 234

PAGE 24

- Paragraph 2 - The comment that it takes 50 years to grow sawtimber could be somewhat misleading; some species can produce small sawtimber in less than 50 years. } 235
- Last paragraph, line 5 - Note a typographical error - "\$12,627" should be \$12,629". } 236

PAGE 25

- Paragraph 1, line 2 - Wood County has paid their state debt, so they now get 90 percent of the timber revenues, the towns get 10% as stated, and the state gets 0 percent. } 237
- Section 3.2.7, paragraph 1, last sentence - Private lands that are entered into Forest Crop Law or Managed Forest Law programs are also open to the public for recreational use, as a condition for entry into these programs. } 238
- Section 3.2.7, paragraph 5 - Necedah National Wildlife Refuge and Meadow Valley Wildlife Area seem to be } 239

RESPONSES TO COMMENTS

Response to Comment No. 228

The 3,650 acres of land owned by Juneau County has been noted in the text and reference to the percentage of County Forest Land has been deleted.

Response to Comment No. 229

The comment has been incorporated.

Response to Comment No. 230

The comment has been incorporated.

Response to Comment No. 231

The comment has been incorporated.

Response to Comment No. 232

The word "region" has been deleted.

Response to Comment No. 233

The suggested wording about fire fighting functions of DNR personnel has been inserted.

Response to Comment No. 234

Discussion has been added regarding manufacturing value and associated wages. The updated table "Hardwood Bombing Range Proposal Expansion Area Wood County Forest Property" provided by Wood County and DNR has been inserted in Appendix I and the updated numbers have been used in the report. The total wage figure provided in the comment appears to be a cumulative figure, not a per year figure; the factors provided have been used to calculate an annual effect.

Response to Comment No. 235

The text has been revised to reflect that some species can produce small sawtimber in less than 50 years.

Response to Comment No. 236

The table has been updated, and a new average gross timber sales revenue figure has been calculated.

RESPONSES TO COMMENTS

Response to Comment No. 237

The comment has been incorporated.

Response to Comment No. 238

Text has been inserted to reflect that lands entered into Forest Crop Law or Managed Forest Law programs are also open to the public for recreational use, as a condition of entry into these programs.

Response to Comment No. 239

The comment has been incorporated.

RESPONSES TO COMMENTS

discussed as if they were in Wood County. As previously mentioned for page 15, they are located entirely in Juneau County.

PAGE 31

- Paragraph 1, lines 3,4 - "A small amount . . . may also be present . . ." This should describe the approximate amount of row crops and pasture rather than speculate on its presence - or will that information be in the land use section of the EIS? 240
- Paragraph 2 - If Wisconsin Rapids is used by Wood County Forest recreationists for lodging, should it have been included in the "Region of Influence"? The study should also recognize a number of private hunting cabins in the immediate vicinity of the proposed expansion area are utilized during the hunting seasons, especially deer season. The study mentions increased hunting would strain capacities of Meadow Valley and Wood County Wildlife Areas, but no mention is made of expected increases in non-consumptive, recreational uses. 241
- Section 4.1.4, paragraph 3, line 5,(3) - These funds would be minimal, as noted in comments for page 4, paragraph 2. 242

PAGE 32

- Table 4.1-2 - The Forestry Fund Account Loan Aid balance is \$00, not \$580 as indicated. 243

PAGE 33

- Paragraph 2 - As noted for page 23, a "20X" multiplier should be used to reflect total economic impact (\$12,629 x 20 = \$252,580 per year). 244
- Paragraph 3 - The road aids for county forest roads is \$300 per mile as of 1996, not \$200. 245
- Paragraph 6 - Wood County paid this loan balance in full in 1996. 246
- Last paragraph (continues to page 35, line 1) - The amount of time or money committed to the Wood County Forest as a whole is expected to remain approximately the same on an annual basis regardless of the possible change in its total acreage due to this proposal. 247

PAGE 35

- Lines 3-7 - The Town of Port Edwards has approximately 7½ miles of public road within the proposed expansion area, not 6.6. Approximately 4 of the 7½ miles border on other towns, which is more than one-half of the total mileage. Because public access to roads would be limited within the proposed expansion area, with some roads gated and closed, road aids to the Town of Port Edwards may be reduced by more than indicated, also on page 4, paragraph 1 of the study. 248
- Paragraph 2, lines 3,4,5 - See previous comments for page 4, paragraph 2, regarding contract expirations. 249

PAGE 36

- Paragraph 4, line 3 - This participating landowner's contract expires at the end of 1999. Would range expansion likely to occur by then? This time perspective would be helpful. 250

PAGE 37

- Section 4.1.5 - Negative impacts from withdrawal of County Forest Land and the resulting decrease in forest management on these lands need discussion. 251

Response to Comment No. 240

The amount of planted acreage of corn and hay has been inserted.

Response to Comment No. 241

Text has been inserted regarding tourism in Wisconsin Rapids, presence of private hunting cabins, and potential for increased non-consumptive recreation use.

Response to Comment No. 242

Payments have been restated based on updated calculations received from the DNR Bureau of Forestry—Forest Tax Section.

Response to Comment No. 243

The references to Forestry Fund Account Loan Aid have been deleted since the loan balance has been paid off by Wood County.

Response to Comment No. 244

The multiplier effect related to forest harvesting has been added to the discussion.

Response to Comment No. 245

The road aid amounts have been recalculated based on the updated value of \$336 per mile provided by the Wisconsin Department of Transportation, District 4, Local Road Coordinator.

Response to Comment No. 246

The discussion and line item for Forestry Fund Account Loan Aid have been deleted since the loan balance has now been paid off by Wood County.

Response to Comment No. 247

The discussion has been expanded to indicate that the amount of time or money committed by the County to the Wood County Forest, as a whole is expected to remain approximately the same on an annual basis regardless of the possible change in its total acreage due to this proposal.

RESPONSES TO COMMENTS**Response to Comment No. 248**

The road aid calculation has been revised based on updated road miles and aid factors provided by the Wisconsin Department of Transportation.

Response to Comment No. 249

Forest tax program amounts have been recalculated and the text revised based on updated information from the DNR Bureau of Forestry—Forest Tax Section.

Response to Comment No. 250

The anticipated timeframe for the proposed range expansion is after 1999. Several tax contracts would still be in effect during this timeframe.

Response to Comment No. 251

Withdrawal of County Forest Land would potentially decrease forest management activities on these lands, however the federal government would also provide for forest management activities on these lands.

- Section 4.1.6, paragraph 1, line 5 - "... are paid would be returned to the state." The state then is required to pass these funds directly to the counties who must use them to offset school costs. This should be recognized in the study. } 252
- Section 4.1.6, paragraph 1, last sentence - The timber cutting (in some cases clear cutting?) needed for target areas, access roads, fire breaks, etc., is not recognized. } 253
- Section 4.1.6, paragraph 2, last sentence - The need for a separate DNR EA or EIS on a potential Wood County Forest withdrawal application would largely depend on whether the Air National Guard's EIS meets the requirements of NR150 Wisconsin Administrative Code. If so, the department should be able to adopt parts or all of the Federal EIS as its EA or EIS, as part of our independent analysis (NR150.20(2)(f)2, Wisconsin Administrative Code). If there is no County Forest withdrawal application, however, there may be no legal requirement for a DNR EA or EIS, depending on whether the department has any other statutory authority or approvals involved in the proposal. } 254
- Section 4.1.6, paragraph 3 - The Wood County Ordinance that requires "... funds received from sale of County Forest Lands withdrawn from the County Forest Land program must be used to purchase other land for this program" is another reason to assess the direct and indirect socioeconomic impacts of obtaining replacement lands. } 255

PAGE 38

- Paragraph 1 - Comparing the proposed expansion area timber to only statewide figures tends to minimize the loss. Loss of this property would also have a significant impact to Wood County forest production. Both statewide and local perspectives are appropriate. } 256
- Section 4.1.7, paragraph 2 - Loss of this block of County Forest Land would be significant to the area's recreation. This block contains high quality wildlife habitat (especially huntable species) close to Wisconsin Rapids. } 257

PAGE 39

- Section 4.2.1 - The negative impacts of lease restrictions that could be placed upon private lands should be recognized in more detail. } 258

PAGE 40

- Paragraph 1, last sentence - The 6,162 acres of County Forest presently in the proposed expansion area would have to be withdrawn under continued county ownership and range expansion; this is not an "assumption". } 259
- The Study should also discuss the legal necessity and ramifications of County Forest withdrawal and replacement if Federal condemnation is pursued. } 260
- Section 4.2.4, paragraph 2 - Loss in timber value due to gunnery range activity should also be recognized here. } 261
- Section 4.2.6, lines 4,5,6 - "... more forestry management planning ..." is very doubtful. Timber management would be more difficult with loss of timber value due to range restrictions, metal in trees, etc. } 262

PAGE 42

- Section 4.4, paragraph 1 (continued onto page 43) - Opposition from local citizens in towns where the county would be likely to look for replacement lands should be recognized. (See previous comments in "General Comments" section above). } 263

RESPONSES TO COMMENTS**Response to Comment No. 252**

Text has been added to indicate that these funds are passed on to counties who must use them for schools.

Response to Comment No. 253

Text has been inserted indicating that timber cutting would be needed for target areas, access roads, fires breaks, etc.

Response to Comment No. 254

Text has been added to indicate that part or all of the Federal EIS could be adopted by Wisconsin DNR as part of its independent analysis for the State's own EA or EIS.

Response to Comment No. 255

A discussion of socioeconomic effects of obtaining replacement lands is contained in Subsection 4.4 of Appendix I.

Response to Comment No. 256

A comparison with Wood CFL timber sales data has been added to the text to supplement the statewide data.

Response to Comment No. 257

Access to land areas acquired for the range expansion would continue for recreational uses based upon appropriate operational and safety parameters. Wood County Forest Land located outside of the expansion area, including approximately 31,000 acres, would continue to be available for recreation use. Other public lands in the area provide recreation opportunities as described previously, although some areas may be nearing capacity for hunting and increased non-consumptive use of these lands could increase conflicts with hunting. Impacts on wildlife habitat are discussed in Biological Resources (see Subsection 4.8.2.1).

Response to Comment No. 258

The text indicates that restrictions on land uses would be similar for Options 1 and 2. Therefore, repetition of the land use effects described in Option 1 in detail, are not repeated under Option 2.

Response to Comment No. 259

The text has been changed to delete the words "it is assumed that".

RESPONSES TO COMMENTS**Response to Comment No. 260**

Land acquisition through condemnation would have similar socioeconomic effects to the acquisition of land through voluntary purchase and sale. Both would be based on the appraised value of the property and in both cases, relocation costs would be paid by the Federal government, private lands would be taken off the tax rolls once they are owned by the Federal government, and the operation and potential socioeconomic effects of the expanded range would be similar.

Response to Comment No. 261

Text has been added regarding loss of timber value due to proposed range construction and training activity.

Response to Comment No. 262

Following the phrase "For all options," the remaining part of the sentence has been deleted and text added to indicate that timber management would be more difficult because of factors such as the loss of timber value due to range restrictions and metal fragments in trees.

Response to Comment No. 263

Text has been added to indicate that Wood County has conducted preliminary investigations of possible locations of replacement lands for the CFL and has reported that local citizen opposition was encountered and is likely to be encountered at other locations.

RESPONSES TO COMMENTS

PAGE 43

7

- Section 4.4.1, sentence 1 - This section should mention the benefits to the public and the county of a large, contiguous block of forest, and that obtaining another large, contiguous block is unlikely (refer to comments in the "General Comments" section, also for page 38, Section 4.1.7, paragraph 2). Also, "private lands" would be better described as "private lands that would be acquired by the county as replacement of withdrawn County Forest Land." } 264
- Section 4.4.2, line 2 - "... would have to be vacated by existing owners." is incorrect because of the county commitment to acquire lands only from willing sellers. Impacts resulting from possible Federal condemnation should also be described. } 265

PAGE 44

- Section 4.4.7 - This section should recognize the expected overall net loss of recreational lands. County Forest replacement lands would likely include some private lands (such as timber company lands and Forest Crop Lands) that are presently available for public recreation. Sentence 2 should be modified to recognize the replacement might only partially "offset" the loss of recreational access to lands in the proposed expansion area. } 266
- Section 4.5, paragraph 1, last sentence - Since Wood County would likely acquire lands to replace any County Forest Land withdrawal, analysis of the various indirect and tax base fiscal effects listed in that sentence should have been included. } 267
- Section 4.5, paragraph 2, (2) - See previous comments for page 4, paragraph 2, line 5 regarding expiring contracts of Woodland Tax Law and Forest Crop Law program lands (the dollar amounts listed may not be accurate). } 268

PAGE 45

- Table 4.5-1, Option 1 - Port Edwards one-time penalty - These 200 acres will go into the Managed Forest Law program on January 1, 1998. Assuming 3 years before withdrawal (end of year 2000), the penalty would be in the neighborhood of \$6 to \$7 per acre for a total of \$3,600 to \$4,200 (200 acres × 3 years × \$6 to \$7). } 269
- Table 4.5-1, - The Option 2 "Federal Lease from Existing Owners Annual Revenue Loss" footnote (b) recognizes the "potential annual revenue losses do not account for possible reductions in assessed valuation that may result from military use of private lands leased to the Federal Government." Probable decreases of economic value of lands that would be used for bombing and strafing, having considerable amounts of bullets, bombs, etc. in the land and its trees, deserves more consideration in this study. Also see next comment for page 46. } 270

PAGE 46

- Paragraph 1, Option 2 - Sentence 3 states "Unknown reductions ... of private lands could occur, resulting in decreased tax revenues." "Would" or "are likely to" are more appropriate than "Could". An attempt should be made to qualitatively assess this decrease. Also, (2) states that penalties to local jurisdictions would be the same as described under Option 1 (refer to our previous comments for page 4, paragraph 2, line 5 regarding expiring contracts and for page 45, Table 4.5-1). } 271
- Paragraph 2, Option 3 - Would there be state payments of local property tax on State Department of Military Affairs-owned land that might be acquired from the county? If so, how does the amount compare to the present situation? } 272

Response to Comment No. 264

New text has been inserted describing that Wood County has indicated that because of land use and ownership patterns, the likelihood of obtaining another large, contiguous block of forest is unlikely. Therefore, non-forested lands or croplands mixed with forested lands are more likely, as well as holdings that are less contiguous than the existing expansion area holdings of CFL.

Response to Comment No. 265

The comment does not recognize the possibility of any residents being willing sellers. Wood County's policy to acquire lands only from willing sellers has been added. Land acquisition through condemnation would have similar socioeconomic effects to the acquisition of land through voluntary purchase and sale. Both would be based on the appraised value of the property and in both cases, relocation costs would be paid by the Federal government, private lands would be taken off the tax rolls once they are owned by the Federal government, and the operation and potential socioeconomic effects of the expanded range would be similar.

Response to Comment No. 266

The potential for an overall net loss of recreational lands to occur is now addressed.

Response to Comment No. 267

The analysis that has been provided discusses potential types of socioeconomic effects from acquisition of replacement lands. Considering the fact that the current ownership status and location of such replacement lands is not known, estimates of these effects have not been made.

Response to Comment No. 268

Benefits have been restated based on updated data from the Forest Tax Unit of Wisconsin DNR.

Response to Comment No. 269

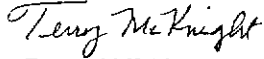
See response to Comment No. 268.

Response to Comment No. 270

Decreases in assessed valuation of leased private lands located in the expansion area would be speculative and have been identified as an effect but not quantified.

Thank you for considering these comments. Please contact me if you have any questions.

Sincerely,



Terrence McKnight
Environmental Review Coordinator

cc: Jim Addis, SS/6
Ed Nelson, SS/6
Dave Siebert, SS/6
Bill Tans, SS/6
Bob Mather, FR/4
Tom Lovejoy, Eau Claire
Pat Murphy, Eau Claire
Tom Quilty, Mauston
Mike Beaufeaux, Rhinelander
Mike Zeckmeister, Sandhill
Steve Grant, Wisconsin Rapids
Dale Dorow, 250 Oak St., Mauston, WI, 53948-1345
Paul Westeguard, 400 Market St., P.O. Box 8095, Wisconsin Rapids, WI, 54494
Lisbeth A. Springer, 816 State St., Suite 500, Santa Barbara, CA, 93101

RESPONSES TO COMMENTS

Response to Comment No. 271

"Would" has been changed to "could". Decreases in assessed valuation of leased private lands located in the expansion area would be speculative and have been identified in the study but not quantified. Tax program benefits have been restated based on updated data from the Forest Tax Unit of Wisconsin DNR.

Response to Comment No. 272

It does not appear that the State Department of Military Affairs would pay local property taxes on public land acquired from Wood County, however this would not reduce property taxes since none are currently paid on public lands owned by the county.

HARDWOOD BOMBING RANGE
PROPOSED EXPANSION AREA
WOOD COUNTY FOREST PROPERTY

MERCHANTABLE TIMBER

SPECIE	ASPEN	OAK	R. PINE	J. PINE	W. PINE	HDWD.	TOTAL
ACRES	2006	1052	504	197	79		3838 acre
CORDS	16,819	10,170	11,531*		1627	4820	44,967 cords
\$/CORD	\$18.25	\$9.01	\$37.31		\$31.11	\$13.84	
TOTAL \$	<u>\$306,947</u>	<u>\$91,632</u>	<u>\$430,222</u>		<u>\$50,616</u>	<u>\$66,709</u>	<u>\$946,126</u>
MBF**		527.75	2,273.29		50.75		2851.7
\$/MBF		\$90.00	\$90.00		\$90.00		MBF
TOTAL \$		<u>\$47,497</u>	<u>\$204,596</u>		<u>\$4,568</u>		<u>\$256,661</u>
GRAND TOTAL	<u>\$306,947</u>	<u>\$139,129</u>	<u>\$634,818</u>		<u>\$55,184</u>	<u>\$66,709</u>	<u>\$1,202,788</u>

NON-MERCHANTABLE TIMBER

SPECIE	ASPEN	OAK	R. PINE	J. PINE	W. PINE	HDWD.	TOTAL
ACRES	1107	203	126	71	43	53	1603 acres

NON-FORESTED

Lowlands (includes lowland brush, grass marshes, etc.) 696 acres
 Uplands (includes upland brush and upland grass) 83 acres
 TOTAL ACRES 779 acres
 Total land area from recon data within proposed range expansion area is 6220 acres

* Includes red and jack pine
 ** MBF = 1000 board feet

Price figures (per cord and per MBF) used to calculate timber values are weighted averages from Wood County's latest timber bid opening held in June 1997.

OTHER COMMENTORS

AUG 29 1997

Mr. Knudsen,

No one we've talked to in Wood County wants a bombing range expansion. Juneau County residents around Camp Douglas seem to be the only people to gain anything with some possible cash flow. Our family feels the bombing range should stay in Juneau County. Yeah, I guess the Air National Guard can screw us over by Condemnation, but why not have the bombing range in the County that gets any benefits. A possible win win situation would be to have the bombing range on the Federal Government Forest in Juneau County. Please see Wisconsin Map between highway 21, highway 173, and highway 80 in Juneau County. The Wood County Forest Crop Land you want to take over should be left as is. The Wood County residents would be happy and if the bombing range was on the National Forest in Juneau County it would still be close to Camp Douglas. The Federal Government has some 90 square miles of forest in this area, which should be plenty of land for training.

THANK YOU FOR YOUR TIME,
WOOD COUNTY TAXPAYERS

RESPONSES TO COMMENTS

Response to Comment No. 1

The Air National Guard has no jurisdiction to acquire lands presently under the administration of another Federal agency. Lands such as the Necedah National Wildlife Refuge already have a specific mission in their own right and therefore represent an extremely undesirable alternative to fulfill the need expressed by the Proposed Action.

RESPONSES TO COMMENTS

Brenda Erickson

1040 35th Place
Apt. 1
Two Rivers, WI 54341
(414) 793-4974

Sept. 11, 1997
Air National Guard Readiness Center
ANGRC/CEVP
3500 Fetchet Ave.
Andrews Air Force Base, MD 20762-5157

Dear Program Manager:

Since I was a child, I've acquired fond memories of my grandfather's homestead in Finley, near the Hardwood Air-to-Ground Weapons Range.

Driving there (most of my family lived in the town of Port Edwards and Nekoosa, and many still do), we always heard the sounds of the range — sonic booms were commonplace throughout the county — but once at the house, a rather weather-worn but sturdy two-story home surrounded by a multitude of trees and wildlife, the noises died down.

The house now serves as a hunting lodge for my grandfather's sons, their children and many friends, who converge on the area during both bow and gun season.

Hunting has long been a tradition in my family, not only for sport — all have a great respect for the land, and head out early for the sunrise as much as the first shot of the day — but to expand food sources to supplement what they're able to buy on factory incomes.

But it is not only for my family that I write in protest of the expansion of the Hardwood Air-to-Ground Weapons Range.

There is precious little undisturbed wooded land left in the world, and what remains must be preserved. Also, the impact of such an expansion will be overwhelmingly detrimental to the ecosystems of the area.

Please, for the future of our children — who deserve to know what a quiet walk in a woods where wildlife and wildflowers abound is like — please reject this expansion.

Sincerely,

Brenda Erickson
Brenda Erickson

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

RESPONSES TO COMMENTS

To the Editor:

September 18, 1997

OPEN LETTER TO COL. KENT ADAMS, MANAGER HARDWOOD EIS:

Dear Col. Adams:

At the public hearings on the Expansion of the Hardwood Bombing Range, I submitted my comments as Director of the Coalition for Peaceful Skies. I also included a legal analysis of military use of County Forest Lands prepared by the Minneapolis Law Firm, Dorsey and Whitney. As you can see, such military use is "prohibited" by State Statute 28.11.

The purpose of my comments is to show that the EIS is incomplete, untruthful and a waste of taxpayers money.

First I believe that the "No-Action" alternative as presented in the EIS is an outright lie. The EIS asserts that the "No-Action" alternative would mean that military units would continue to train using the current range. That is not true. In the same EIS it says: "Experience has shown that realistic training for tactical aircraft REQUIRES a LAND AREA at least 7 miles by 5 miles for target dispersion." Col. Adams, the land area of the current range is a tiny 2 miles by 6 miles. It is obviously unrealistic, even unsafe, to continue using the current range, given its small size. The truth is that the "No-Action" alternative, which means not acquiring the additional acreage, would result in the closure of the Bombing Range. And Range closure will cost millions and millions of dollars. To clean up the contaminated soil and groundwater on the Range will be more expensive than expanding the Range and keeping it open.

More importantly, I question the legality of the land acquisition options presented by the Air Force in their attempt to expand the range onto 6,000 of County Forest Land in Wood County. My overall point is that purchase or lease of State protected County Forest Land for use as a bombing range is prohibited by State Statute 28.11.

The EIS assumes that the 6,000 acres of County Forest Land that is needed for the expansion is owned by Wood County. That is a mistake. The Wood County Forest Land is owned by the entire citizenry of Wisconsin. That Statewide County Forest Program is funded by State taxes, and withdrawal of acreage from the County Forest Program is forbidden, unless the withdrawal will result in a "better and higher use" that will benefit the people of Wisconsin as a whole. That's the law.

We, the people of Wisconsin, intend to fight the removal of OUR County Forest Land from Public Domain. We will demand that our elected officials take a stand against the use of OUR County Forest Land for bombing and staffing. And we will go to Court, whenever necessary, to prevent the Federal government from trampling on our State laws which protect Forest Lands for future generations.

Respectfully,

Pat Conway
337-4404

Response to Comment No. 1

Experience has established the goal that ranges should be 7 miles by 5 miles in size to conduct optimum training. However, some training can be accomplished in smaller areas, though not as effectively. The EIS text has been revised for clarification. Experience has shown that realistic tactical aircraft training is most effectively accomplished in an area that is at least 7 miles by 5 miles. If an area of those dimensions is not available, the military adjusts the flight profiles to accomplish as much training as possible within the available boundaries.

Response to Comment No. 2

Section 28.11(1) of the Wisconsin Statutes does not specifically state that military use of county forestlands is authorized or prohibited. In the past, the Wisconsin Attorney General's Office has stated that lack of specific statements giving authorization is a shortfall. One Attorney General stated this could be remedied by "either legislative amendments or the expansion of existing military establishments." Clearly, the pursuit of the expansion is what is now being addressed. However, this prohibition against use does not stop the withdrawal of the lands from the County Forest Law Program and sale of the lands for range expansion. That decision will be based on the results of the environmental studies. If a decision is made to expand the range, the county and the Wisconsin's Department of Natural Resources will be involved in the withdrawal process.

Response to Comment No. 3

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

FOR IMMEDIATE RELEASE: Sept. 15, 1997 Contact: Pat Conway 608-337-4404

EXPANSION OF HARDWOOD BOMBING RANGE VIOLATES STATE LAW

The Coalition for Peaceful Skies asserts that the Air National Guard's plan to expand the Hardwood Bombing Range involves the illegal withdrawal of County Forest Land from public domain. "State Statute 28.11 forbids the sale of County Forest Land to the military," said Pat Conway, director of the Coalition, "and we intend to do all that we can to prevent the illegal withdrawal of County Forest Lands from our Statewide program."

The expansion of the Hardwood Bombing Range involves the removal of two separate tracts of County Forest Land from the State's County Forest Program. The first tract of 3,400 acres, in Juneau County, is already included in the existing Bombing Range. It has been permitted for use in the Range through an easement that started in 1954. Now, in order to expand the Bombing Range, the Department of Defense wants to own the Juneau County Forest Land outright. Juneau County is attempting to withdraw those acres from the State controlled program. Juneau County stands to gain \$25 million if the Bombing Range expansion goes through.

The second tract of land, in Wood County, is 6,000 acres of beautiful, untouched forest and wetlands, home to several endangered species, including wolves. There would be a substantial loss of income to the citizens of Wood County if the forest were sold and used for bombing and trafficking. "Juneau County gets a financial windfall and Wood County gets the bombs," Conway explained. The Wood County Board of Supervisors has voted unanimously to oppose the taking of their County Forest Land for the range.

The County Forest Land program is a State-County joint venture, wherein Counties are paid with State tax money to maintain and protect the forests for recreational use, forestry, watershed protection and wildlife protection. Wisconsin was the first state in the nation to establish a County Forest Program. "Now the State Program is in danger of being completely gutted," claims Conway.

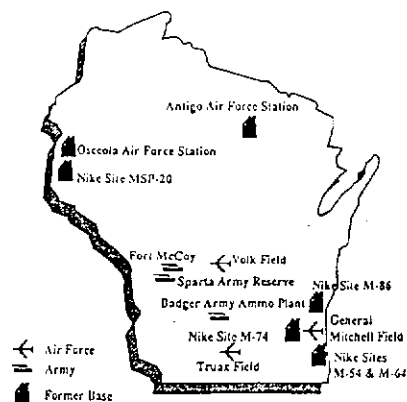
State Statute 28.11 expressly forbids the withdrawal of County Forest Land from the DNR managed program unless it is to be put to a "better and higher use", that will benefit the citizens of Wisconsin as a whole. Conway believes: "If Juneau County is allowed to remove their County Forest Land from the Statewide program for use as a bombing range, then County Forest Land could be withdrawn and sold for any number of destructive purposes and the entire County Forest Program would be meaningless."

The DNR has, however, approved the withdrawal of the Juneau County Forest acreage, and now is being sued by a group of Juneau and Wood County citizens who claim that the withdrawal was approved illegally.

"But one lawsuit is not enough," states Conway. "We must have a Statewide effort to save our public forests for future generations." An "Act Now" sheet of suggestions to stop the County Forest withdrawal is available from the Coalition. Call 608-337-4404 for more information.

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WISCONSIN Military Toxics Sites



* denotes Formerly Used Defense Sites (FUDS).

Contaminated Facilities # Sites In Progress \$ FY94 \$ FY95-Completion Total \$ Amount

*Antigo Air Force Station	3	263,000	1,892,000	2,155,000
Badger Army Ammunition Plant—Olin Corp.	13	29,574,000	222,783,000	252,357,000
*Badger Army Ammunition Plant	4	314,000	3,616,000	3,930,000
*Camp Havens	2	0	1,933,000	1,933,000
Chippewa Falls Army Reserve Center	5	0	0	0
*County Line National Guard Training	1	0	10,000	10,000
Dodgeville Army Reserve Center	5	0	0	0
Fond du Lac Army Reserve Center	2	0	0	0
Fort McCoy (Army)	14	3,709,000	9,378,000	13,087,000
Gen. Mitchell Air National Guard Base	1	947,000	2,359,000	3,306,000
*Havenwoods Forest Preserve	3	13,000	2,229,000	2,242,000
Husley Army Reserve Center	8	0	0	0
*LaCrosse National Guard Target Range	1	16,000	0	16,000
Ladysmith Army Reserve Center	7	0	0	0
Manitowish Army Reserve Center	8	0	0	0
Milwaukee Army Reserve Center	1	0	50,000	50,000
Milwaukee Army Reserve Center (Silver Springs)	16	0	0	0
*Milwaukee Branch U.S. Disposal Barracks	1	13,000	0	13,000
*Nike Site MSP-20	2	193,000	1,560,000	1,753,000
*Nike Site M-20 (Lake Park)	3	71,000	1,958,000	2,029,000
*Nike Site M-54	3	65,000	1,915,000	1,980,000
*Nike Site M-64	3	141,000	2,144,000	2,285,000
*Nike Site M-74	3	131,000	1,962,000	2,093,000
*Nike Site M-86	3	0	1,728,000	1,728,000
*Osceola Air Force Station	2	148,000	63,000	211,000
Pewaukee Army Reserve Center	3	0	0	0
*Richard Borg Air Force Base	1	13,000	0	13,000
Sparta Army Reserve Center	14	0	0	0
Trux Field Air National Guard Base	5	1,397,000	4,260,000	5,657,000
*Trux Army Air Field	4	2,523,000	1,937,000	4,510,000
*Two Creeks	1	13,000	0	13,000
*Two Creeks Gap Filler Annex	1	0	10,000	10,000
Volk Field Air National Guard Base	4	2,687,000	3,306,000	5,993,000
*Wausau Family Housing Site	1	0	10,000	10,000
*Wehr Steel Com. Mill	1	11,000	0	11,000
*Williams Bay Air Force Station	1	72,000	5,000	77,000

STATE TOTAL 150 42,214,000 265,158,000 307,372,000

The role of Citizens for Safe Water Around Badger (CSWAB) is to ensure community members and workers are empowered in the decision-making process; we believe this participation will provide a powerful, long-term solution to military toxics in our rural communities, and will ensure clean, safe drinking water for ourselves and generations to come.

CITIZENS FOR SAFE WATER AROUND BADGER
E12629 WEIGAND'S BAY SOUTH • MERRIMAC, WI 53561 • (608) 643-3124

Is DNR protecting *our* County Forest Lands?

Wisconsin state law requires the DNR to do an **Environmental Impact Statement (EIS)** on any action that has a major environmental impact.

The DNR claims that the proposed action of the withdrawal of **3,400 acres of Juneau County Forest Land** for exclusive use as a bombing range does not necessarily constitute a major environmental action.

The DNR is waiting to receive public comment before it makes its final decision on whether to go with a complete EIS or slide by with an inadequate Environmental Assessment (EA). Your input is important!

The time for public outcry is now. Let the DNR hear from you either in person at the public hearing in Mauston on Sept. 24th at 7pm or in writing by Oct 14th to: **Paul Pingrey, DNR, 250 Oak Street, Mauston, WI 53948.**

Actual quotes from the DNR Environmental Assessment (EA)

Pg. 11: "No record has been found for any environmental clean-up"...of an ANG fighter crash on County Forest Land, June 22, 1983.

Pg 11: "...DNR presently has no detailed information about air or water pollution occurring on the proposed County Forest Land withdrawal... the department considers acquiring such ...data ...to be beyond the scope and need of this environmental assessment."

Pg13: "Detailed wildlife surveys have not been conducted."

Pg 13: "Little information about endangered resources on the County Forest Land within Hardwood Range is available."

Pg 15: "The proposed County Forest withdrawal...will have no effect on Native American archeological resources."

Our message to the DNR: **"An EA will not do!
It's an EIS we want from you!"**

ACT NOW TO SAVE OUR COUNTY FORESTS

There is no immediate need for the Department of Defense to purchase the Juneau County Forest Land outright for the existing Hardwood Bombing Range. The military's lease on that land doesn't expire until 2025. But if removal and sale of the Juneau County Forest Land is permitted, then Wood County Forest Land could also be removed and sold for the Range expansion project. The Department of Defense is attempting to overlook and override State Statute 28.11 which prohibits sale of County Forest Land for destructive purposes. We must ACT NOW to prevent this illegal withdrawal in Juneau County if we are to protect our public forests for future generations.

Here are three ACTION STEPS you can take RIGHT NOW:

1. **WRITE LETTERS:** We need letters to our State officials, especially Attorney General James Doyle, insisting that they make a commitment to prevent the removal of County Forest Land for military purposes. His address:

Attorney General James Doyle, Dept. of Justice, 114 E. State Capitol Bldg.
Madison, WI 54701.
2. **ORGANIZE PUBLIC INFORMATION MEETINGS:** Few citizens fully understand the threat this Juneau County withdrawal represents. Get folks into a meeting to study the facts and take some action. Call the Coalition for Peaceful Skies (608) 337-4404 to borrow a ten minute video on the destruction of County Forest Land at the Hardwood Bombing Range. We also have handouts on the DNR's history of giving special treatment to the military in Wisconsin.
3. **GO TO COURT:** State Statute 28.11 protects County Forest Land for ALL CITIZENS OF WISCONSIN. We need several lawsuits to be started on this issue by various citizens and organizations. Call Sara Lee Fassbender at the Environmental Law Project sponsored by the State Bar Association. The program offers 4 hours of free consultation with an attorney on environmental law issues. Since the DNR has already approved the Juneau County withdrawal, the loss of County Forest Land is an imminent action which would cause significant harm to each and every citizen of Wisconsin. That gives each and every citizen the right to stop the action through an injunction. Or consult an environmental attorney on other options citizens have to prevent the loss of County Forest Land for Military purposes. The Environmental Law Project: 608-250-6019.

**I pledge allegiance to the earth
and to the flora, fauna and human life that it supports,
one planet indivisible,
with safe air,
water & soil,
economic justice,
equal rights and
peace for all.**



Public Comment Session September 18, 1997 Wisconsin Rapids
for Proposed Hardwood Bombing Range Expansion

Brothers and sons, we call you to arms
to the arms of our Mother!
Can't you see we're related

even to trees,
our pledge of allegiance
to the whole Earth family?

Your vision is cramped and narrow
so you can't see the forest.

Yes, your range needs expansion,
and your arms
want more than weapons.

We call you to arms
so compassion can be wedded to power.

We call you
to open your arms and remember

*women never birth enemy faces -- (*Meridel LeSueur's Rites of Ancient Ripening)

Brothers and sons, the defense we need
is for our forest, for earth's resources.

The future we need
for your children, for all the faces women birth,
is a future free of fear,
a countryside of holy trees
and harmony
and harmony.

- Silvermarie

Lost

Stand still. The trees ahead and the bushes beside you
Are not lost. Wherever you are is called Here,
And you must treat it as a powerful stranger,
Must ask permission to know it and be known.
The forest breathes. Listen. It answers,
I have made this place around you.
If you leave it, you may come back again, saying Here.
No two trees are the same to Raven.
No two branches are the same to Wren.
If what a tree or bush does is lost to you,
You are surely lost. Stand still. The forest knows
Where you are. You must let it find you.

David Wagoner

The munitions disposal site should be closed and remediated as soon as possible.

The draft EIS states no live ordnance is utilized at Hardwood, subsequently there is no apparent need for keeping this site open. The draft EIS reports: "One Defense Installation Restoration Project is located on the Hardwood Range. This site has been used since 1976 for annual burning and burial of spent munitions. A small plume of contaminated groundwater has been identified in that area. No monitoring is currently being performed at the site."

The characterization of the combustion products in the EIS is based on obsolete, incomplete information.

In an attempt to measure and identify emissions from the burning of propellants, Sandia National Lab recently conducted the so-called "Bang Box" tests. According to this report, emission factors from these tests included toxic and carcinogenic substances such as carbon monoxide, methane, benzene, 2,4 dinitrotoluene, 2,6 dinitrotoluene, and nitrogen oxides. Potential toxic emissions include lead, cadmium, and chromium - standard constituents of conventional propellants.

According to the Overview of the Health Effects of Selected Munitions Chemicals published by the USEPA and the Department of the Army, "DNT is classified B2 (probable human carcinogen) and thus a Lifetime HIA is not recommended. The cancer potency is associated with hepatocellular and mammary gland carcinogenic activity in rats after 2,4-DNT treatment. 2,4-DNT also may be a promoter. There is some evidence which suggests that 2,6-DNT has both initiation and promotion activity and, therefore, may be a complete carcinogen."

The Army's Health Risk Assessment for the Open Burn Facility at Badger Army Ammunition Plant describes the incremental carcinogenic risk for exposure to DNT's from open burning of propellants. Of considerable concern are the multiple potential exposure pathways including inhalation, soil ingestion, dermal contact, and food ingestion and the increased and additive risks associated with each of these exposure pathways. Non-carcinogenic health risk are increased as well; toxic metals-contaminated ash, dispersed by open burning, exposes soldiers and nearby residents through inhalation, soil ingestion, dermal contact, and food ingestion. Other pollutants including NOx, CO, VOC's and TSP increase and compound risks to human health.

In addition to fire hazards, burning red phosphorus emits toxic fumes of oxides of phosphorus and can react with reducing materials.

The characterization of potential ecological, environmental and human health impacts of Titanium Tetrachloride in the draft EIS is incomplete, and therefore incorrect.

Titanium Tetrachloride is a colorless or light yellow, fuming liquid with a pungent odor. Signal charges used in training ordnance at Hardwood reportedly each contain 17 cubic centimeters of titanium tetrachloride. The "smoke" described in the draft EIS is actually poisonous gases, according to the US Department of Health and Human Services (USDHHS) Toxicological Profiles. In a fire, poisonous emissions include titanium oxides and hydrochloric acid.

Titanium Tetrachloride is classified by the Department of Transportation and the US Environmental Protection Agency as a Hazardous Substance, and is on the Special Health Hazard Substance List because it is corrosive.

According to the USDHHS, breathing Titanium Tetrachloride can irritate the nose, throat and air passages, causing cough and phlegm. Repeated exposure can cause chronic bronchitis and may cause emphysema. Higher exposures can cause fluid in the lungs, a medical emergency, and even death. Skin contact can cause burns.

The USDHHS reports acute (short-term) ecological effects may include "the death of animals, birds, or fish, and death or low growth rate in plants. Acute effects are seen two to four days after animals or plants come in contact with a toxic chemical substance. Insufficient data are available to evaluate or predict the acute, short-term effects of Titanium Tetrachloride to aquatic life, plants, birds, or land animals."

Chronic (long-term) ecological effects may include shortened lifespan, reproductive problems, lower fertility, and changes in appearance or behavior. Chronic effects can be seen long after first exposure(s) to a toxic chemical. Insufficient data are available to evaluate or predict the chronic, long-term effects of Titanium Tetrachloride to aquatic life, plants, birds, or land animals.

For more information contact:
Citizens for Safe Water Around Badger (608) 843-3124
Coalition for Peaceful Skies (608) 435-6743 or (608) 289-2694

WHY THE HARDWOOD RANGE EXPANSION IS STUPID!

"Construction and maintenance and bombing could possibly have the following effect on wetlands: altering groundwater discharge/recharge characteristics, reduced potential for filtering and treatment for water quality protection, reduced potential for attenuation and storage of stream and floodwater, loss of floral diversity, and loss of fishery and wildlife habitat."

Draft Environmental Impact Statement Addressing the Hardwood Range Expansion and Associated Airspace Action, Wisconsin Air National Guard, August 1997.

Viable, environmentally and economically superior alternatives were eliminated from consideration early in the EIS process and not carried forward for detailed study.

Utilizing electronic scoring of simulated weapons delivery and increasing flight simulator training is actively and successfully used by the U.S. Air Force, contrary to statements in the draft EIS. These technologies are currently able to meet the "accuracy parameters" required by the USAF, contrary to the draft EIS.

Just last year, Kelly Air Force Base in San Antonio, Texas, installed a Unit Training Device (UTD) flight simulator. The UTD is one of 65 such units currently utilized by the USAF at bases across the nation. According to the UTD program manager for the Air Force, a "quality, full-mission trainer used to cost as much as the F-16 is simulated, now we are purchasing trainers for less than \$1 million each

and experiencing a 95 percent cost reduction in comparison to traditional mission simulators."

The UTD simulator is used by the 182nd Fighter Squadron of the Texas Air National Guard's 149th Fighter Wing to train its F-16 pilots – the same aircraft used at the Hardwood Range – in emergency procedures, avionics, air-to-air and air-to-ground combat, and tactical fighting in a dense, threat environment. According to the facility's press release, the Guard pilots are also able to practice acquiring and identifying targets and accurately delivering weapons in adverse weather conditions at day or night.

Unlike previous F-16 simulators, which have had to be housed in gymnasium-sized high bays, UTD trainers can be operated within a standard squadron office environment. While operating a traditional F-16 weapon system trainer in a specially designed facility has cost about \$50,000 a month, today individual UTD simulators can be operated for a fraction of the amount. The base reports these cost savings are being driven by a leap in computer technology that also has enabled UTD simulators to maintain a high degree of flight training realism.

The UTD program, the report concludes, began to take shape when the Air National Guard identified the need for a unit-level pilot trainer. At the time its units did not have simulators, which required aircrews to travel to distant Air Force bases where F-16 simulators were located.

The potential environmental, ecological and health impacts of using Chaff on public, private, and tribal lands were omitted from the EIS.

Chaff is an airborne radar-detection countermeasure consisting of extremely fine fibers of aluminum coated fiberglass. A typical burst Chaff bundle contains approximately 2.1 million human hair size fiberglass strands. After its dispersal and use in military training exercises it becomes a waste material that falls to the ground.

The use of chaff at Fallon Naval Air Station, Nellis Air Force Base, Mountain Home Air Force Base, and at military installations across the nation is a growing concern for rural residents. According to the Rural Alliance for Military Accountability (RAMA), rural residents and the Bureau of Land Management officials are finding clumps of chaff on public and private lands throughout central Nevada.

The Nevada Division of Environmental Protection noted two primary concerns. "The first concern is from inhalable particulate below PM10 which may occur from the decomposition and resuspension of fiber particulate by mechanical means. The Division's second concern deals with the physical disposition of what could be considered solid waste on public and private lands in the State of Nevada. There is very little information on the amounts of chaff currently deposited and how these fibers decompose in the environment." The Nevada Division of Environmental Protection concluded "The Division does not feel that adequate studies have been done to assure that there are no environmental risks posed by the fibers."

The mechanical breakdown of these silicate fibers can be defined as asbestos-like, tiny filaments, and could, if inhaled or ingested, lodge in body tissue. The health risks associated with inhalation or ingestion have never been independently researched. According to Department of Defense studies, "The minimum dimension of a chaff fiber is 0.0003 inches, which converts to 7.6 micrometers. This is less than the 10 micrometer maximum size cutoff in EPA's standard for inhalable particulate." Moreover, the National Institute for Occupational Safety and Health (NIOSH) considers crystalline silica (a respirable dust) "a potential human carcinogen."

The Air Force report *Identifying and Estimating the Effect of Chaff from Military Aircraft* documented the lack of information on potential health risks, saying, "There is no documentation of human exposure studies to chaff." The report continued by noting, "Detailed authoritative data concerning the impacts of chaff on land is lacking. The long-term effects of chaff are unknown."

The Army in 1992 concluded: "The potential of weathering fibers to respirable geometries in the environment and the potential exposure from resuspension of these fibers need to be determined to evaluate long-term risk and chronic exposure scenarios." The report continued, "Glass and carbon fibers and, likely iron fibers deposited on soils are susceptible to wind resuspension until immobilization occurs. However, even those fibers immobilized on soil surfaces can be resuspended by physical forces such as foot and/or vehicular traffic. Thus, there is a persistent risk of fiber inhalation and mitigation efforts will likely be required for areas containing high fiber concentrations."

The presence of extensive wetlands, together with a facility-wide shallow water table, eliminates the Hardwood site as a viable training area.

The draft EIS clearly states: "Extensive wetlands are located within the Hardwood Range, proposed expansion area and Restricted Area R-6964A." (Page 3-18). Moreover, the EIS characterizes "ordnance impact" as "significant surface disturbance." And finally, the EIS says construction and maintenance and bombing could effect wetlands by "altering groundwater discharge/recharge characteristics, reduced potential for filtering and treatment for water quality protection, reduced potential for attenuation and storage of storm and floodwater, loss of floral diversity, and loss of fishery and wildlife habitat."

One of the most vague statements in the entire draft EIS is on page 4-22: "None of the activities associated with the Proposed Action would have an impact on groundwater resources underlying the expanded Hardwood Range." As groundwater is hydrologically connected to adjacent wetlands, this would seem impossible.

The Watershed Protection Approach, as recognized by the USEPA, is "a management approach for more effectively protecting and restoring aquatic ecosystems and protecting human health. The EPA Office of Water is using this approach to focus on hydrologically defined resource areas, watersheds, and aquifers. The USEPA recognizes that water quality management must enhance human and ecosystem health and that managing for one without considering the other can be detrimental to both." (Emphasis added.) (Source: *Watershed Protection: A Sustainable Approach*, EPA Office of Wetlands, Oceans and Watersheds, USEPA, August, 1995).

EPA Administrator also supports this approach saying: "The EPA's overall goal is to prevent adverse effect to human health and the environment and protect the nation's groundwater resources in accord with federal law. It will counter adverse effects (significant and reasonable risks) to the resource and the pollution in the near and long-term. Prevention is emphasized because groundwater cleanup is costly and difficult. Safe drinking water is the primary goal, along with the protection of interconnected surface water resources and ecosystems." (Source: *Protecting the Nation's Groundwater: EPA strategy for the 1990s*, July 1997, Final Report of the EPA Ground Water Task Force).

Written Comment Form

SEP 25 1997

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

RESPONSES TO COMMENTS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Larry Francis
TITLE/ORGANIZATION: Wood County Park & Forestry Dept.
ADDRESS: PO Box 8095 4500 Market St Wiscasset, ME 04985-8095
(Street) (City/State/Zip)

- COMMENTS -

The following comments are my personal comments
not related to my job or position with Wood County

(1) I use the County forest areas a great deal
for hunting, hiking, and other recreation.
The loss of the County forest areas would extremely
limit my enjoyment of this area (as a taxpayer)
and would put undue pressure on private
land owners to open their land to hunting.

(2) I did not know how much airspace was
limited until I went to the public hearing on 9/18/97
but I feel this would definitely limit economic
growth in our area because of these air
space limitations.

(3) It will be very hard to replace lost
land area for recreation.

(4) I do not disagree with the military's
need to practice and train the pilots for
future problems however I feel the location
should be changed to an area with
less promise of growth. Here in Central Wisconsin
we need to continue our economic growth
not slow it.

(5) I am a 4 year Veteran of the US Air Force and realize
the need for the area but I think there needs to
establish a training area should be explored.

Please hand this form to the staff, drop into the
collection box, or mail to:

Program Manager, Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fetchet Avenue
Andrews AFB, MD 20762-5157

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 2

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 3

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 4

The use of other training areas was examined as part of the development of the alternatives studies in the EIS and is given in Subsection 2.3.2. The proposal was designed to minimize conflicts with potentially sensitive areas while providing the training resources necessary to meet military readiness requirements. Because of limited fiscal resources and aeronautical constraints, virtually all of our nation's fighter units train in airspace that is within a "tank of gas" of the aircrews' home station.

Response to Comment No. 5

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Written Comment Form

SEP 20 1997

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Lois McMahon
TITLE/ORGANIZATION: PRIVATE CITIZEN
ADDRESS: 1111 WHITROCK AV WIS RAPIDS W.I. 54494
(Street) (City/State/Zip)

- COMMENTS -

I do not believe the expansion of the Hardwood Bombing Range should be allowed. The state of Wisconsin and in particular Wood County, can not afford to lose this large tract of recreational forest land. While I understand and approve the need for a well trained military, it seems to me to be wrong to take this irreplaceable county land when others of military bases have been and are being closed. I would hope the Air National Guard could find another solution and leave the area for present and future generations to enjoy.

Once again - I am opposed to the expansion of the Hardwood Bombing Range in Central Wisconsin

Lois McMahon

I agree with the above statements

Robert J. McMahon

Please hand this form to the staff, drop into the collection box, or mail to:
Program Manager, Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fetchet Avenue
Andrews AFB, MD 20762-5157

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

SEP 22 1997

Maj. Dave Olson,

Enclosed is a highlighted map of Juneau County United States Government owned land southwest of the existing bombing range. According to Air Force regulations, the required land area for tactical aircraft training is at least 7 miles by 5 miles for target disposal. This means at least 22,400 acres of land is needed for proper training. With an expansion into Wood County, the land mass would still only be 15,066 acres. The Air National Guard still would need an additional 7,334 acres to meet Air Force safety regulations. Wood County strongly opposes a bombing range expansion, and with Juneau County board members supporting a bombing range, this area should at least deserve a fly over. There are 73,000 people that live in Wood County compared to 21,000 people in Juneau County (Population figures are on page 12 and 16 in E.I.D. book). A 7 mile by 5 mile land mass can be laid into the U.S.A. land several different ways. Since the Federal Government owns the property anyway, is there a need for condemnation? With some clean up, the existing range could possibly be the wildlife area. Shouldn't National defense training be on Federally owned lands? This option should really be looked into and no it still may not be the win win alternative everyone wants, but it brings to mind there might be. I would like this information formally entered into the Impact Statement Process. The U.S.A. lands total over 41,000 acres, and maybe law suit for bombing Juneau County Forest Crop Land can be cancelled also?

Wood County Taxpayer,
Troy Bray

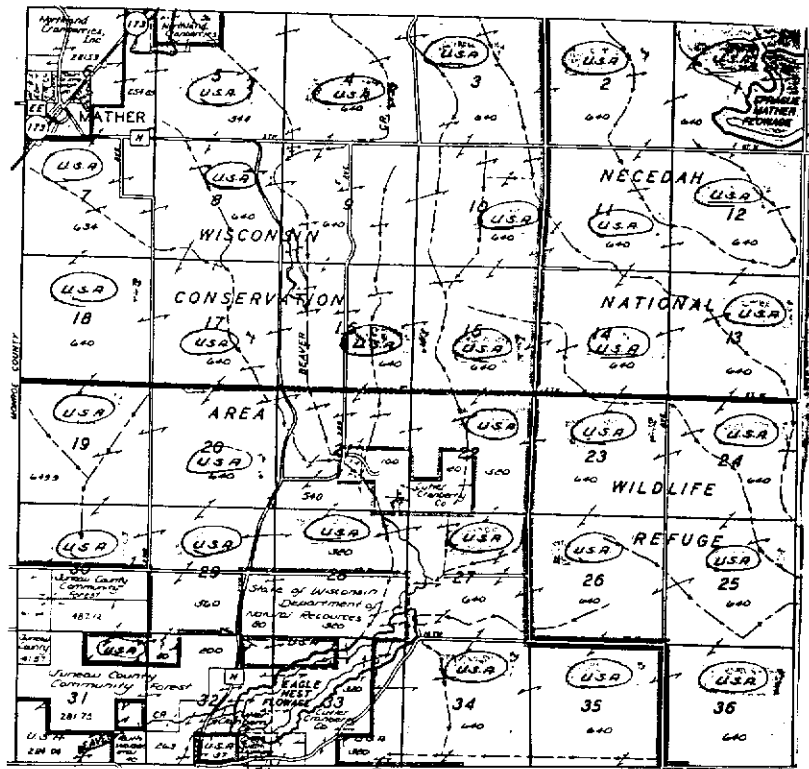
RESPONSES TO COMMENTS

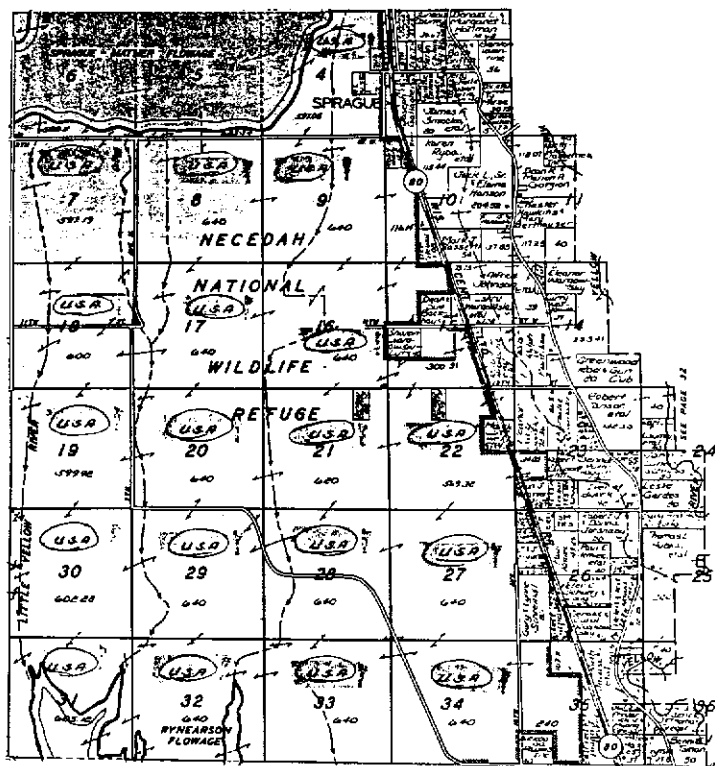
Response to Comment No. 1

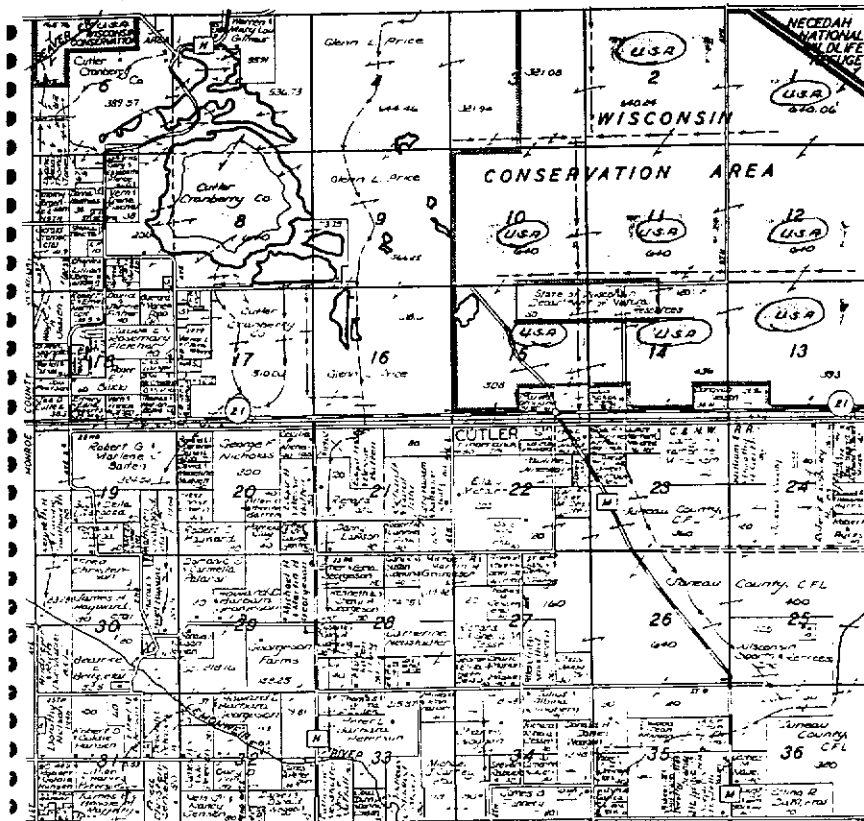
The proposed range expansion is to accommodate weapons safety footprints for the aircraft and missions that have been identified as a need by existing or proposed range users. Any other training that would be required would have to meet established safety footprint areas for that training event. If these footprints are within the property, the missions could be accomplished. If the footprints fall outside the property, these missions would have to be conducted elsewhere.

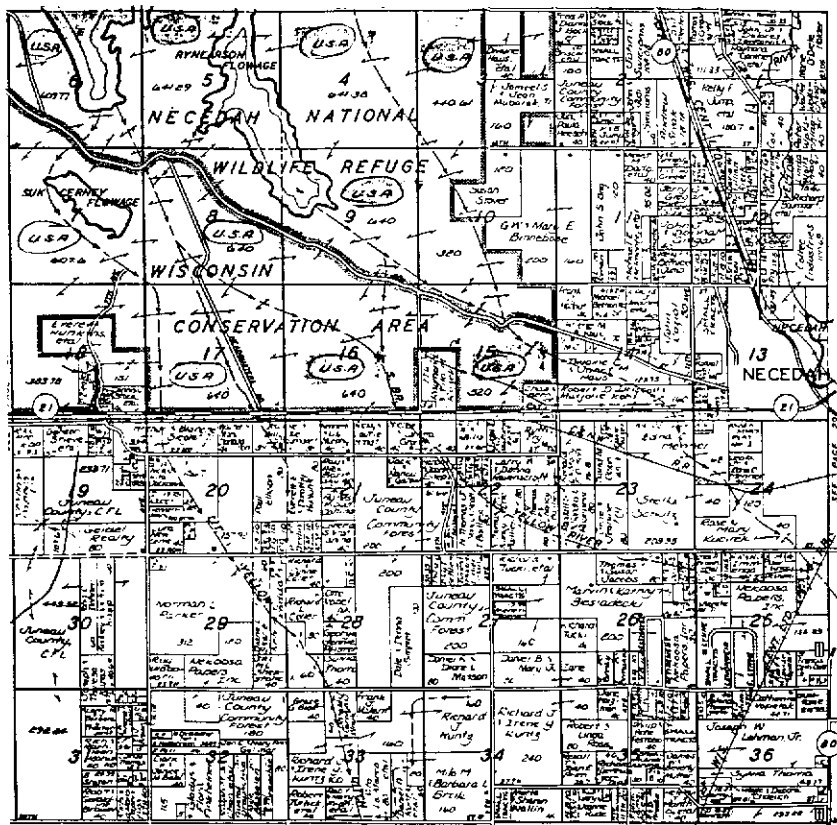
Response to Comment No. 2

The Air National Guard has no jurisdiction to acquire lands presently under the administration of another Federal agency. Lands such as the Necedah National Wildlife Refuge already have a specific mission in their own right and therefore represent an extremely undesirable alternative to fulfill the need express by the Proposed Action.



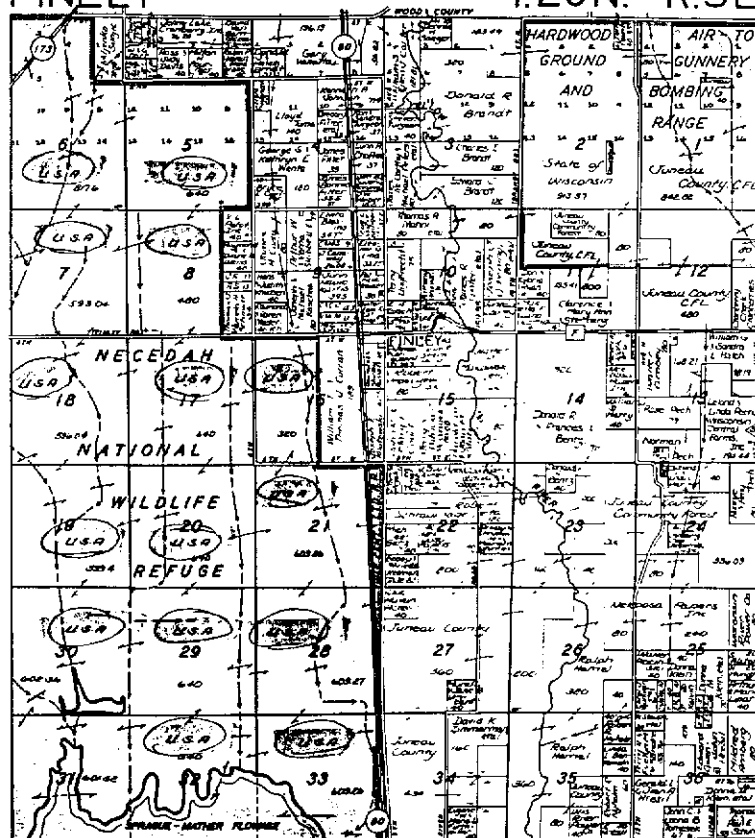




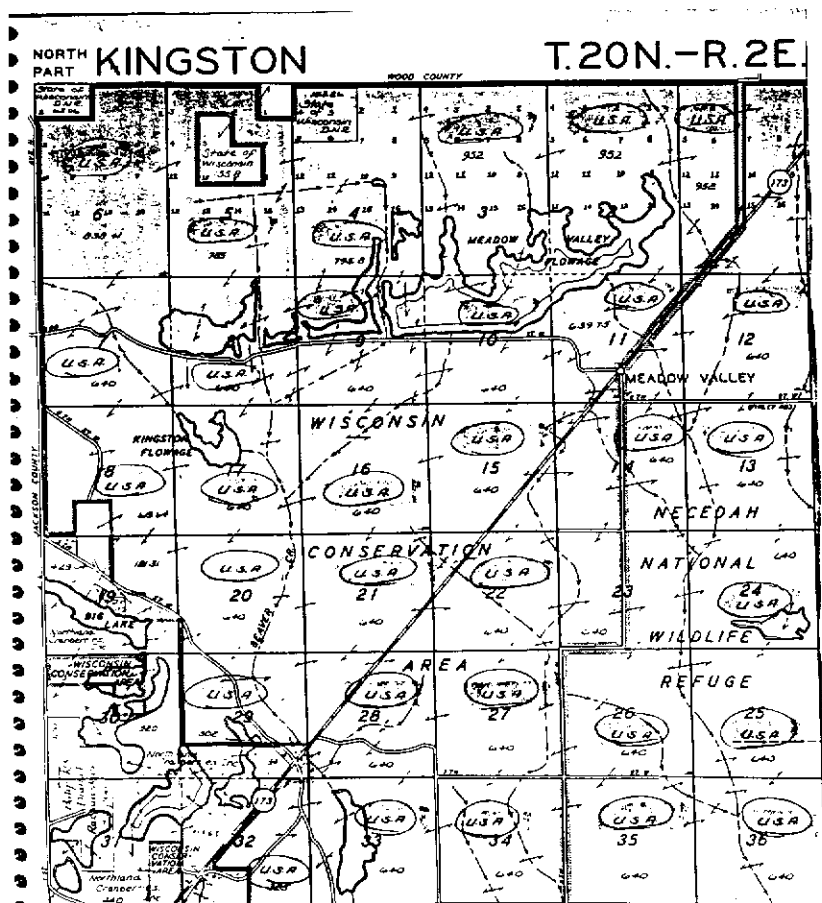


FINLEY

T.20N.-R.3E



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Written Comment Form

SEP 25 1997

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Larry Francis
TITLE/ORGANIZATION: Wood County Park & Forestry Dept.
ADDRESS: PO Box 8095 400 Market St. Wisconsin Rapids, WI 54981-8095
(Street) (City/State/Zip)

- COMMENTS -

The following comments are my personal comments not related to my job or position with Wood County.

(1) I use the County forest areas a great deal for hunting, hiking and other recreation. The loss of the County forest areas would severely limit my enjoyment of this area (as a taxpayer) and would put undue pressure on private landowners to open their land to hunting.

(2) I did not know how much airspace was limited until I went to the public hearing on 9/19/97 but I feel this would definitely limit economic growth in our area because of these airspace limitations.

(3) It will be very hard to replace lost land area for recreation.

(4) I do not disagree with the military's need to practice and train the pilots for future problems. However, I feel the location should be changed to an area with less promise of growth. Here in Central Wisconsin we need to continue our economic growth not slow it.

(5) I am a 4 year veteran of the US Air Force and realize the need for the area but I think other areas to establish a training area should be explored.

Please hand this form to the staff, drop into the collection box, or mail to:

Program Manager, Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fitch Avenue
Andrews AFB, MD 20762-5157

RESPONSES TO COMMENTS

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 2

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 3

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 4

The use of other training areas was examined as part of the development of the alternatives studies in the EIS and is given in Subsection 2.3.2. The proposal was designed to minimize conflicts with potentially sensitive areas while providing the training resources necessary to meet military readiness requirements. Because of limited fiscal resources and aeronautical constraints, virtually all of our nation's fighter units train in airspace that is within a "tank of gas" of the aircrews' home station.

Response to Comment No. 5

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

RESPONSES TO COMMENTS

Amos Miller
RR 3 Box 66
Westby, WI 54667

September 25, 1997

Program Manager, Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP,
3500 Fletcher Avenue, Andrews AFB, MD
20762-5157

Dear Program Manager,

I'm writing in regards to the Expansion of The Hardwood Bombing Range Draft Environmental Impact Statement, issued recently. Thank you for the opportunity to learn more about the proposal to expand the Hardwood Range at informational meetings held this past week in Mausten, Black River Falls, and Wisconsin Rapids. Being able to speak in a public hearing format, and have those comments recorded by stenographer to be included in the record for the final environmental impact statement was an important aspect of the EIS process. The law allows for the citizens affected by this proposal to comment, and have their views incorporated into the decisions made.

As a resident of Wisconsin, and as a member of Citizens United Against Low Level Flights, I have been watching closely the developments related to the expansion proposal. After careful reading of the DEIS, I'd like to raise concerns and ask questions about specific items in the draft.

Section 2-28 finds that Class A mishaps would not be significantly altered by the proposed action. However, a landing strip is going to be installed. Don't accidents occur more frequently during take-offs and landings?

Section 2-29 talks about clean up after an accident. When an F-16 from Madison crashed at Strum, Wisconsin in June, 1995 it took three months to sign a contract to clean up hazardous materials. How can the public be confident that an emergency related to bombing practice will be professionally handled with this kind of track record?

Section 1-10 speaks about Hot MOAs being announced on a recorded message. Section 4-3 states that non-military pilots can get a message on an 800 number. If there is foul weather, and a flight is canceled, how soon will the recorded announcement be changed? Pilot's have complained that the message is not changed. How many days during a year is an MOA declared Hot for more than an 8 hour stretch?

Section 2-22 talks about the ANG following FAA rules to minimize hazards. Section 4-3 speaks to emergency medical flight experience. Letters that have been submitted to the EIS, with copies sent to Citizens United, show that crop dusting aircraft working for cranberry growers, and MedFlight helicopters have experienced near misses with military aircraft. At least one area airport with planes on the runway has been buzzed by military planes flying overhead. Why are none of these pertinent facts mentioned in the DEIS?

Response to Comment No. 1

As described in Subsection 3.3.3.1 of the EIS, the Class A mishap rates reflected in the document consider the life-time operational use of the aircraft, under all conditions of flight. Therefore, any mishap occurring during any phase of flight is reflected in the statistic. As discussed in the EIS, risks associated with aircraft mishaps is low.

A complete discussion of Class A mishap rates is contained in Subsection 3.3.3.1 of the EIS. Tabulation of statistical projections for Class A mishaps for each aircraft using the airspace associated with this proposal is presented in Subsections 3.3.3.1 and 4.3.3 for current and proposed use conditions, respectively.

Response to Comment No. 2

The initial response to an aircraft accident focuses on rescue, evacuation, fire suppression, safety, and elimination of explosive devices, ensuring security of the area, and other actions immediately necessary to prevent loss of life or further property damage. Subsequently, the investigation phase is accomplished.

If an aircraft accident occurs on non-federal property, regardless of the agency initially responding to the situation, as soon as the situation is stabilized, a National Defense Area will normally be established around the accident scene, and the site will be secured for the investigation phase.

As soon as possible after all required investigative actions on the site are complete, the aircraft will be removed, and the base civil engineer will accomplish clean-up of the site, or will contract an outside agency to accomplish the clean-up.

Response to Comment No. 3

The recorded message is transmitted on a civilian aircraft radio frequency. It reports scheduled MOA activity and Tower/RAPCON status. It is updated whenever MOA activity changes, (i.e., when a unit cancels its scheduled time or when the last aircraft leaves the area). Records are also kept when the message is updated. The toll-free number is answered in-person in Operations during regular hours, or voice mail when Operations is closed. The Volk West MOA is the highest use MOA. Over the last 3 years, it has been active for over 8 hours 15 to 20 days per year.

Response to Comment No. 4

The proposed range expansion is not anticipated to have an adverse impact on "Spirit of Marshfield" helicopter medevac operations. The Marshfield Base Manager has an agreement with Volk Field personnel which includes procedures to ensure that military flight operations will be curtailed, if necessary, to ensure that "Spirit of Marshfield" flights with patients will have direct, unimpeded access to their destination. In addition, Minneapolis Air Route Traffic Control Center personnel assign the necessary

RESPONSES TO COMMENTS

Section 2-31 states that the Air National Guard avoids populated areas. Have residents of neighboring populated areas submitted comments or letters for EIS? What do they say?

Section 3-3 states that emergency medical aircraft are occasionally denied use of the MOAs. How often is occasionally? Are there records to illustrate this?

Section 2-7 talks of the high water table in the area to be used for a landing strip. What will it cost to build this landing strip? What are the projected costs for all the improvements related to this expansion proposal?

Section 2-30 speaks of livestock habituation having already occurred in the affected areas. How will new animals to the area respond to jet overflight noise?

Section 2-26 includes a table showing day/night averaging of noise from military overflights. How can we believe that noise will not be a problem, as is claimed in the DEIS, if one low-level airplane flying directly overhead will make noise that exceeds 100 decibels, as mentioned in section 2-25? We will not accept these noise events, or their "unavoidable adverse impacts", as mentioned in section 2-27.

As concerned residents of Wisconsin, we want to know the results of coordination that was to have taken place between the Air National Guard and the Fish & Wildlife Service and then be addressed in the EIS. The Fish & Wildlife Service made many requests and suggestions relating to the proposed action. After two and a half years of research, shouldn't we know the results of this coordination?

Section 4-51 to 4-55 refers to Ho-Chunk Indian issues. A memorandum of agreement with the Ho-Chunk has yet to be signed. Will the resolution submitted by the Ho-Chunk legislature opposing the range expansion proposal be ignored? After two and a half years of study, shouldn't these topics be resolved in the DEIS? When will the expansion area be surveyed for undocumented Ho-Chunk sacred sites or artifacts? What is the delay?

Of the Guard units to fly sorties in the MOAs, how many are based closer to other bombing ranges? The only identified unit within 100 miles of Hardwood Range is Madison. The mileage savings of at least two other units is very small; two units, Springfield and Sioux City, actually have to fly farther to get to Hardwood than they would if they were traveling to the range closest to home. How does this add up to economy and cost savings?

Section 2-15 states that unobligated availability of Fort McCoy can't meet air National Guard requirements for training. Can't the public know how many times in a year Fort McCoy is requested for use but unavailable, so we can clearly understand the need for additional facility?

Section 1-8 and 2-17 mention the criteria for AMRAAM, high altitude, medium, and low-altitude training call for all to be within 100 miles of home field or Volk Field. How does this rule affect units proposed to use an expanded Hardwood Range? Section 1-12 refers to several hundred additional comment letters included in the EIS process. Are we, the taxpayers who pay for this study, entitled to know exactly how many letters were received for the EIS? How many in favor of the expansion? How many opposed?

When did the official comment period for the DEIS expire? The Fish & Wildlife Service letter is dated 7-11-95. Was this received within the comment period? A proper response from any concerned party was nearly impossible to put together within the allotted time.

Section 2-5 claims that much of the land north of the existing range is sparsely inhabited. How many people live there? How many people live in the restricted area? How many in the MOAs? Shouldn't this kind of information be in the DEIS?

priority to "Spirit of Marshfield" flights to ensure direct flight routing. The Marshfield Base Manager has also established an excellent working relationship with Volk Field personnel to ensure that problems are resolved as they are identified.

The ANG takes the public's concerns about pilot accountability very seriously. Any misconduct by a military pilot is a serious matter. If a member of the public is experiencing any problems with the military's operations in any of the airspace in the area that affects a person directly, the public affairs officer at the nearest military installation should be contacted immediately, or call (608) 245-4339.

Response to Comment No. 5

All comments and letters submitted to the Air National Guard are presented in Volumes II and III of this Final EIS.

Response to Comment No. 6

See response to Comment No. 4.

Response to Comment No. 7

The exact location or finalized requirement for a landing zone has not been determined. Therefore, any cost estimate would be premature at this time.

Response to Comment No. 8

The best available information indicates that the effects of aircraft overflights on wildlife and livestock are generally short-term and minor, with no mechanism for long-term effects such as reduced reproduction, increased mortality, or habitat abandonment. Noise impact studies from a variety of military use areas were considered in the impact analysis process. Please refer to Subsection 4.8.1.3 of this EIS for further discussion of noise impacts to wildlife.

Response to Comment No. 9

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 10

Coordination with the USFWS is ongoing and will continue, as appropriate, prior to implementation of the proposal, as required by Section 7 of the Endangered Species Act.

Response to Comment No. 11

Once a course of action is selected by the ANG, a MOU could be developed as part of the Section 106 process for monitoring significant cultural resources in the area of potential ground disturbance. This process is detailed in Subsection 4.9.1.2 of the EIS. There are no MOUs presently pending between the ANG and the Ho-Chunk Nation.

RESPONSES TO COMMENTS

Response to Comment No. 12

The primary training feature available at Volk Field is the instrumented system called the Air Combat Maneuvering Instrumentation (ACMI) system. Volk Field is one of only a few ACMI systems throughout the United States. While flying ACMI missions through Volk Field, units will accomplish air-to-surface training on the Hardwood Range. Because both capabilities are at Volk Field, training can be accomplished more efficiently than at their home unit. While Hardwood Range may be further away than that unit's "backyard range," cost savings result from being able to accomplish two types of training requirements (air-to-surface weapons delivery and instrumented training) from the same location.

Response to Comment No. 13

Records of requested use and non-availability of Fort McCoy are currently not being kept. However, past experience and knowledge of activities at Fort McCoy indicates that little time would be available for military aircraft training.

Response to Comment No. 14

No change in the criteria. Readers can review all the letters submitted concerning this EIS by reviewing the entire contents of Volumes II and III of this Final EIS.

Response to Comment No. 15

The comment period for the Draft EIS expired on November 21, 1997. The 7/11/95 letter from the Fish and Wildlife Service is a scoping letter submitted prior to the preparation of the Draft EIS. It should be noted that the ANG accepts comments throughout the entire process.

The Council on Environmental Quality provides guidelines for the preparation of Environmental Impact Statements and their review by the public and various government agencies. These guidelines direct agencies to "allow not less than 45 days for comments on draft statements" (Section 1506.10 of the guidelines). The comment period for the Hardwood Range EIS was extended to 91 days to facilitate review opportunities. The initial Notice of Availability and mailings of over 600 copies of the Draft EIS was accomplished by August 21, 1997.

Response to Comment No. 16

The land north of the range expansion area is primarily located within the Wood County Forest, however, property owned by a cranberry grower and several private land owners is also located adjacent to the northern boundary. Population counts are not available. Population associated with the MOAs is discussed in Subsection 3.12.2, MOA Utilization.

RESPONSES TO COMMENTS

Section 3-90 says that Volk Field provides 197 jobs. How many jobs are provided by the cranberry farm to be taken over? How many jobs in other cranberry marshes whose crop dusting planes might be threatened? How many jobs in the tourist industry might be lost if an expansion is approved?

Section 4-27 states that federal agencies are directed to avoid new construction in wetlands unless there is no practicable alternatives. Construction, maintenance, and bombing would adversely affect these sensitive areas. Why were the alternatives to the proposed action not addressed more completely?

Section 2-30 claims there will be no adverse impacts on wildlife. The Department of Natural Resources refutes this, and is very unhappy with the many inadequacies in the DEIS.

The Wood County Board remains unanimously opposed to the Hardwood Range expansion, and are against turning over more than 6,000 contiguous acres of county forest land to the Air National Guard as the proposal requires. The DNR will insist that the Wood County Board substitute comparable land for the county forest land that would be given up. How can small scattered parcels be considered equivalent to a single section of forest land larger than 6,000 acres? How would this land exchange occur, and how much would it cost? Why was this very critical matter not discussed in greater detail in the DEIS?

Section 2-16 states that units approaching Hardwood Range from the west or south, using VR-1650, would have an increased distance to travel to use Hardwood Range. What does this mean? Obviously, if the low-level flight training corridors that were originally part of this proposed action had not been dropped from consideration in the DEIS, these would have been the preferred route to Hardwood from the west or south. Page xv, table S-2 illustrates the historic usage of the various airspace components at Hardwood Range, Volk South MOA being recently added to the configuration in 1993. Will the quadrupled use of Volk South assessed in the DEIS result in the need and eventual request of new MTR corridors south and south-west of Hardwood Range? It is quite clear that Volk South was established with southern and south-western MTRs as an essential future component. Proposed primary using units for an expanded Hardwood Range in section 2-17, table 2-5 show units to the south and south-west. How can these units use Hardwood Range economically without southern and south-western MTRs approaching? These units all have range access as close to or closer to home than Hardwood Range. This is an important question, and the public has the right to know.

I am convinced that the Hardwood Range expansion is incomplete and ineffective without the proposed new MTRs that were dropped from consideration in April of 1996. It is my understanding that this proposed action must be laid out to the citizenry in its entirety; that to push through one portion and then to wait until a future date to push through another portion is considered piece-meal, and against procedure.

It has been shown conclusively, according to the DEIS study, that operational limitations made establishing new MTR corridors in southern and south-western Wisconsin leading to Hardwood Range not practicable. If this is true, how then can expanding the Hardwood Range be reasonable? Most of the very same operational limitations exist in the Wood County forest land being considered for the expansion in this proposal.

Please respond to these concerns.

Thank You. Sincerely,

Amos Miller

Response to Comment No. 17

The number of jobs associated with the cranberry farm located in the range expansion area is not known. The estimated income produced by a typical cranberry farm with 25 planted acres using 1997 prices is discussed in Subsection 3.12.1.3, Employment and Local Economy. Access into and through restricted airspace for cropdusting flights is coordinated with the Minneapolis Air Traffic Control Center, and while timing may be affected, cropdusting flights would not be prevented. Tourism effects are unknown, however recreation access would be limited for safety reasons, but still available on the expanded range. Also, some existing recreational users of the range expansion area may choose to visit the area and use other nearby recreation areas.

Response to Comment No. 18

The ANG firmly commits to not impact wetlands in development of the proposed expansion area. Much of the Hardwood Range, proposed expansion area, and surrounding areas are comprised of similar wetlands that would continue to function unimpeded at the regional level. Use of best management practices to control construction site and bombing-induced erosion would be followed.

Response to Comment No. 19

The EIS states that potential impacts to wildlife would exist, but would generally be low with the implementation of specific mitigation measures. Comments and concerns from the DNR will be taken into consideration in the development of mitigation measures to minimize potential impacts to wildlife and other resources.

Response to Comment No. 20

As of this publication, the Air National Guard has not received any proposals that could be construed as an approach to provide alternate lands that could replace lands lost if the Department of Defense approves the range acquisition, as outlined in Section 1. If the acquisition occurs, it is anticipated that a majority of the forest lands and agricultural uses would remain as they exist today. If the Department of Defense approves the acquisition, depending on how it is accomplished (i.e., fee simple purchase, leasing from owners or the State, license, etc.), replacement lands would be an action that the State of Wisconsin or Wood County could address, as appropriate.

008LE

Amos

Miller

RESPONSES TO COMMENTS

Response to Comment No. 21

Comment noted. The text of the EIS has been corrected so the word "west" is changed to read "east." Because the start point for VR-1650 is approximately 40 nautical miles northwest of Volk Field, units south and east of Volk Field would have to fly past the range to get to the start point for VR-1650, then fly to the range.

Response to Comment No. 22

The original proposal did include MTRs from the south. Because of operational constraints imposed by existing environmental conditions, these MTRs were removed from the proposal. The Volk South MOA is still viable for users as a tactical entry or exit area in conjunction with the range expansion because north-south or south-north tactics could be utilized.

Response to Comment No. 23

There are no plans or requirements at this time or in the foreseeable future for a re-examination or re-proposal of military training routes from the south or southwest into Hardwood Range.

Response to Comment No. 24

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).



**Natural
Resources
Foundation**

Of Wisconsin, Inc.

September 26, 1997

Board of Directors

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Collins Ferris, Vice Pres.
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Trygve Solberg

Executive Director

Martin Henert

Major David Olson
Program Manager, Hardwood EIS
Environmental Division
Air National Guard CEVP
3500 Fetchet Avenue
Andrews AFB, Maryland 20762-5157

Dear Major Olson:

I am writing on behalf of the Natural Resources Foundation of Wisconsin to express our deep concern that the draft Environmental Impact Statement on the Hardwood Range Expansion and Associated Airspace Activities does not adequately address the impact of the proposed expansion on endangered and threatened species in Wood County, Wisconsin.

I am particularly concerned regarding the impact of the proposed expansion on nesting trumpeter swans, an endangered species in Wisconsin. The Natural Resources Foundation has worked extremely hard along with other conservation partners to reintroduce the trumpeter swan into Wisconsin. We are making consistent progress in the recovery effort and we hope to reach our goal of twenty nesting pairs of trumpeter swans in Wisconsin by the year 2000. Wood County is a principal nesting site for the trumpeter swans.

I am extremely concerned that the impact on nesting trumpeter swans by the noise associated with the significant increase in the number of flights in the expanded airspace associated with the proposed bombing range has not been adequately addressed in the draft environmental impact statement.

The limited studies cited in the draft statement do not support the conclusion that the expanded airspace activity would not have an impact on nesting trumpeter swans. The studies cited dealt with other species of birds and are themselves inconclusive. At a minimum, more specific research must be done before reaching such a conclusion.

Please include this letter as part of the public comments on the draft Hardwood Range Expansion Environmental Impact Statement.

Sincerely yours,

Martin Henert
Executive Director

RESPONSES TO COMMENTS

Response to Comment No. 1

The ANG has been and will continue to work with the U.S. Fish and Wildlife Service, the Wisconsin Department of Natural Resources, and other regulatory agencies to exchange information and study the effects of their actions on threatened and endangered species within the areas affected by its operations. The ANG will continue this cooperative effort and adjust its operations should any information become available that would identify potential impacts on any threatened or endangered species or other wildlife.

Response to Comment No. 2

The best available information indicates that the effects of aircraft overflights on wildlife, including trumpeter swans (i.e., Henson and Grant 1991), are generally short-term and minor. Short-term responses such as alert postures have no identifiable mechanism for long-term effects such as reduced reproduction, increased mortality, or habitat abandonment. Noise impact studies from a variety of military use areas were considered in the impact analysis process. Please refer to Subsection 4.8.1.3 of the EIS for further discussion of noise impacts to wildlife.

SEP 26 1997

Dear Sir or Madam:

I would like a book (At a Hughes)
on Draft Environmental Impact
Statement Addressing The Hardwood
Range Expansion And Associated
Disposal Actions

We live in Shirley, W.V.
and I would really like to know
what is going on about this
Area of lands and land owners.

I thank you very much,
Sincerely,

Clarence M. Julian
102369 County Rd. F
Necedah, Wis. 54646

RESPONSES TO COMMENTS

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments). A Final EIS is mailed to all commentators whose letters appear in this Volume.

Written Comment Form

SEP 29 1997

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Gilbert O. Raddatz
TITLE/ORGANIZATION: Military Veterans Museum
ADDRESS: 5885 County Road A. OSHKOSH WI 54901
(Street) (City/State/Zip)

-- COMMENTS --

I am definatly for..Enlarging the Hardwood Bombing Range..

If there is anything this country needs is Good Pilots...

Ones that can shoot as well as fly..

Gilbert O. Raddatz

Please hand this form to the staff, drop into the collection box, or mail to:
Program Manager: Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fletcher Avenue
Andrews AFB MD 20762-5157

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Marshfield Area
Chamber of Commerce & Industry
P.O. Box 868
700 S. Central Avenue
Marshfield, WI 54449



Barbara Plesner
Executive Director
715/384-3454
FAX 715/387-8925
E-mail: macec@wccic.com

October 2, 1997

Major Kent Adams
United States Air Force Base
Hardwood Range E1S
ANGR/CEVP
3500 Fetchet Avenue
Andrews AFB, MD 20762-5157

Dear Major Adams,

On behalf of the Marshfield Area Chamber of Commerce & Industry Board of Directors, we wish to officially go on record opposing the expansion of the Hardwood Air-to-Surface Gunnery Range and Associated Airspace Actions. If this option is implemented, this action would increase the land area of the Hardwood Range, add a new area for potential target locations and drop zones, and modify restricted airspace.

Though we understand the importance of military preparedness and recognize the federal power of eminent domain, we request that a more serious evaluation be made of the other seven alternatives outlined in the Executive Summary of the Environmental Impact Statement. They may better acknowledge the necessity to be consistent with both the nation's defense strategy and regional economic considerations.

After review of the draft of the Environmental Impact Statement addressing the Hardwood Range expansion and associated airspace actions, the Marshfield Area Chamber of Commerce & Industry Board of Directors has several concerns. The first concern is that the proposal would have a negative impact on general aviation and air commerce at the Marshfield Municipal Airport. It would negatively impact the number and timeliness of departures and arrivals and would impact the use of the S.D.F. approach to the airport's runway. It would also negatively impact the safety and utility of the Spirit of Marshfield helicopter based at St. Joseph's Hospital.

The Marshfield Area Chamber of Commerce Board of Directors also shares Wood County's concerns over the Hardwood Range Expansion. The Socioeconomic Study reflects a combined potential annual revenue loss of approximately \$42,530, along with loss of agricultural use and timber revenues on private lands, withdrawal of over 300

RESPONSES TO COMMENTS

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 2

The proposed range expansion will not have an adverse impact on "Spirit of Marshfield" helicopter medevac operations. The Marshfield Base Manager has an agreement with Volk Field personnel which includes procedures to ensure "Spirit of Marshfield" flights with patients will have direct, unimpeded access to their destination. In addition, Minneapolis Air Route Traffic Control Center personnel assign the necessary priority to "Spirit of Marshfield" flights to ensure direct light routing. The Marshfield Base Manager has also established an excellent working relationship with Volk Field personnel such that problems are resolved as they are identified. Regarding the number and timeliness of departures, arrivals, and the SDF approach at the Marshfield Municipal Airport, the ANG recommends that interested parties contact Volk Field at (608) 427-1201 to resolve any procedural aspects of civil and military flight operations. In addition, the ANG has sponsored an airspace information system broadcast on frequency 120.0 MHz to inform interested parties of when the military operations areas (MOAs) are scheduled for use, and Volk Operations may be contacted by calling (800) 972-8673.

Response to Comment No. 3

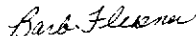
Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Major Adams
Page 2
October 2, 1997

acres of private lands entered in Woodland Tax Law and Forest Crop Law contracts, reduction of public recreation access and use of the expansion area for hunting, hiking, wildlife viewing, and other forms of recreation, closure or relocation of six miles of state snowmobile trails, and closure of approximately 13 miles of public roads through the expansion area.

In closing, the Marshfield Area Chamber of Commerce & Industry opposes the expansion of the Hardwood Range and Associated Airspace Actions for the economic and social well-being of the Marshfield Area.

Sincerely,



Barb Fleisner
Executive Director

cc: Marshfield Area Chamber of Commerce & Industry
Board of Directors

BF/kk

RESPONSES TO COMMENTS

Maggie Jones
RR1, Box 263
Blue River, Wisconsin
53518
phone/fax 608-872-2297

Oct 4, 1997

Air National Guard

Response to Draft EIS, Hardwood Bombing Range Expansion in Wisconsin

Raptors

The Ellis 2 year study (1991) is cited because of its favorable light cast on the military. 20 of 22 nests fledged young and 21 of 22 nests disturbed in the first year returned the second to breed. Of greater significance, the number of jet flights the first year were much fewer in number than the second and the study was not followed into subsequent years to see how increased jet traffic would affect the birds breeding success. pg 4-41 top para.

The Ellis study was on adult birds who were already established territorial breeding birds in the area of jet overflights at the time that the study was started. These birds had already been exposed to the jet noise and activities. Therefore it is not accurate to speculate about naive birds and their probable responses.

From the text of the EIS pg 4-41, first paragraph, "The results of this study indicate that low level jet overflights and mid to high level sonic booms *do not have long term adverse impacts* (my emphasis) to nesting raptors. They go on to contradict themselves in the following paragraph by saying "According to Gladwin and MacKenzie long term reactivity to overflights may result in energy losses which could be a critical problem for animals that are somewhat energy limited in the first place." As any wildlife biologist knows, an "energy limited" state of being is par for the course for any wild animals. Abundance is rare.

It is stated that long term consequences of exposure to these disturbances are unknown. It is also stated numerous times that few studies exist on jet noise response in raptors.

Response to Comment No. 1

The study by Ellis and others (1991) cited in Subsection 4.8.1.3 is one of a number of studies that indicate that raptor responses to aircraft and other types of noise are generally short-term and minor, with no mechanism for long-term impact. Additional studies on peregrine falcons (Enderson et al. 1997, Robie et al. 1998), bald eagles (Grubb and King 1991) spotted owls (Johnson and Reynolds 1996, Delaney et al. 1997), and ferruginous hawks (White and Thurow 1985) also fail to show reproductive or other effects with long-term consequences due to exposure to noise. Many of the birds in these studies had not previously been exposed to noise disturbances similar to those in the study. In addition, wildlife within the ROI for the proposed action have already been exposed to aircraft overflights. The scientific literature indicates that populations of wild animals previously exposed to aircraft overflights are likely to be habituated to such disturbances, and there is no evidence that habituated animals exhibit any effects for aircraft approaches at the distances associated with the proposed action.

Response to Comment No. 2

The statement attributed to Gladwin and McKechnie (1993) was drawn from a critical review of a proposed Air Force training range. Gladwin and McKechnie's statement is speculative; there is no evidence available in the scientific literature to indicate that aircraft overflights result in population-level effects from energy expenditure or any other mechanism.

RESPONSES TO COMMENTS

Response to Comment No. 3

The EIS accurately reflects the USFWS letter in stating that USFWS recommended an avoidance distance of 1,320 feet (0.25 mi) around eagle, osprey, hawk, and falcon nests, bald eagle wintering areas, and colonial bird nesting areas (USFWS 1995). The letter also suggests that flush responses to birds can be minimized by maintaining avoidance distances of at least a quarter mile (preferably greater than 2,500 feet) around known bird concentration areas for fixed-wing aircraft, and up to four or five miles for rotary-winged aircraft. However, THE USFWS does not provide supporting rationale for these avoidance distances. The best available information regarding noise impacts to wildlife indicates that, while startle or panic responses to noise do occur in some wildlife species, these short-term responses to subsonic or supersonic noise do not result in long-term impacts, such as increased mortality or reduced reproductive success to wildlife populations. Subsection 4.8.1.3 of the EIS addresses this issue in greater detail.

Response to Comment No. 4

Although little research has been conducted regarding noise effects on wintering bald eagles, studies of breeding bald eagles (Grubb and King 1991, Grubb and Bowerman 1997) have found that jet aircraft overflights elicited fewer startle or flush responses than other types of disturbance, including pedestrians, vehicles, boats, or helicopters. Eagle alert or flush responses generally did not occur when the jet was greater than 600 meters from the nest.

For species such as wintering bald eagles that may not reuse nesting sites or have multiple roosting or nesting sites, avoidance of known bird concentration areas may not be feasible. However, as discussed above and in Subsection 4.8.1.3 of the EIS, intermittent overflights of bird nesting or roosting areas are unlikely to result in long-term adverse impacts to raptors, waterfowl, or other birds.

Response to Comment No. 5

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

013LO

Maggie

Jones

On pg 4-42, para 4, it is stated in the section on mitigation that the "USFWS typically recommends a distance of 0.25 (1/4) mile for avoidance of impacts to Bald Eagles, Osprey, red-shoulder hawks and peregrine falcon nests; Bald Eagle wintering sites, wildlife in wilderness areas and colonial bird nesting sites." This is not true as the USFWS recommended a range of distance consistently stating a range of "at least a quarter mile, but preferably 2,500 feet (1/2 mile = 2640 feet) above and to the side" of sensitive wildlife areas. They also state that helicopters should stay more than 5 mile away from sensitive areas. In many areas it is recommended that aircraft avoid altogether. These pages are not numbered!! therefore how can you site them?? It is imperative that the mitigation follow the 1/2 mile preferred recommendation.

Bald eagle winter roosts are something I know quite a bit about and the cavalier treatment they get is typical of this report. It is a known fact that winter roosting bald eagles change their site from night to night or from week to week according to changing weather patterns, wind direction being a significant factor in their choice of roost site. It is also a fact that roost sites are still being discovered by researchers. All roost site locations are by no means known, even significant roost areas are yet to be identified. Therefore it is impossible to keep jets away from this threatened species. Even minor disturbance to winter roosts is a major threat to bald eagle survival.

I urge you to drop completely the plans for expansion of the bombing range. Going ahead will be ultimately disastrous for wildlife that is struggling to maintain a toehold on this earth.

cc Senator Russel Feingold
Senator Herb Kohl

Maggie Jones

Mark M. Giese
1520 Bryn Mawr Ave.
Racine, WI 53403

OCT 04 1997

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

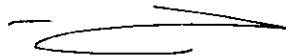
Col. K. Adams, Program Mgr,
Hanswood EIS
Air National Guard CEVP
Andrew AFB MD 20712-5157

Dear Col. Adams:

Concerning the proposed
expansion of the Hanswood
Bombing Range: I oppose it.

Thank you.

Sincerely,



POPULATION
ENVIRONMENT

RESPONSES TO COMMENTS

Route 2, Box 166
Gays Mills, Wisconsin 54631
October 7, 1997

Air National Guard Readiness Center
Program Manager, Hardwood Range EIS
ANGRC/CEVP
3500 Fetchet Avenue
Andrews Air Force Base, Maryland 20762-5157

Sir:

I will attempt to keep my response to the Hardwood Draft EIS short, but, unfortunately, the document provides much to comment on. I will be responding in roughly alphabetical order.

Accidents: Page 2-28 of the study says that Class A mishaps would not be significantly altered by the proposed action. However, a landing strip is a part of the expansion plan. My understanding is that accidents occur more frequently during takeoffs and landings than at other times during a flight. If my information is correct, it would seem to contradict the finding on 2-28.

Information on page 2-29 paints a very optimistic picture of what happens after a plane crash. In fact, after an F-16 from Madison crashed at Strum, Wis., in June, 1995, a contract to remove hazardous materials was not even signed until three months had passed. What plans does the Guard have to ensure that this does not happen again?

Airspace: The draft EIS says that MOAs should be "hot" for at least eight hours a day. General aviation pilots have complained to Citizens United Against Low Level Flights that MOAs are often declared "hot" for far longer than eight hours. What is the past history of the Hardwood MOAs being "hot" for more or less than eight hours a day?

Letters written to EIS, with copies sent to Citizens United, show that crop dusting aircraft working for cranberry growers and MedFlight helicopters have experienced near-misses in encounters with military jets. At at least one airport near Hardwood, planes on the runway have been buzzed by military aircraft flying overhead. Why is none of this mentioned in the EIS?

Page 2-31 reports that the ANG avoids populated areas. This would be more believable if a survey of area residents was reported, for, again, reports to Citizens United say otherwise.

Page 3-3 says that emergency medical aircraft are "occasionally" denied use of MOAs. The Final EIS should define "occasionally" with records from the past several years. Again, reports to Citizens United and resolutions sent to the Environmental Impact Study contradict this finding in the Draft EIS.

Response to Comment No. 1

As described in Subsection 3.3.3.1 of the EIS, the Class A mishap rates reflected in the document consider the life-time operational use of the aircraft, under all conditions of flight. Therefore, any mishap occurring during any phase of flight is reflected in the statistic. As discussed in the EIS, risks associated with aircraft mishaps is low.

A complete discussion of Class A mishap rates is contained in Subsection 3.3.3.1 of the EIS. Tabulation of statistical projections for Class A mishaps for each aircraft using the airspace associated with this proposal is presented in Subsections 3.3.3.1 and 4.3.3 for current and proposed use conditions, respectively.

Response to Comment No. 2

The initial response to an aircraft accident focuses on rescue, evacuation, fire suppression, safety, and elimination of explosive devices, ensuring security of the area, and other actions immediately necessary to prevent loss of life or further property damage. Subsequently, the investigation phase is accomplished.

If an aircraft accident occurs on non-federal property, regardless of the agency initially responding to the situation, as soon as the situation is stabilized, a National Defense Area will normally be established around the accident scene, and the site will be secured for the investigation phase.

As soon as possible after all required investigative actions on the site are complete, the aircraft will be removed, and the base civil engineer accomplishes clean-up of the site, or contracts to an outside agency to accomplish the clean-up.

Response to Comment No. 3

In the past year, the Volk West MOA was the most heavily used. It was used on 212 days and activated a total of 637.8 hours. That averages to 3 hours per day. It is estimated that the MOA was activated for more than 8 hours approximately 15 to 20 days per year.

RESPONSES TO COMMENTS

Response to Comment No. 4

There is a public use airport located in the Falls 2 MOA. The airport is currently charted for military aircraft for avoidance of 1,500 feet when within 3 miles of the airport. Volk Field and range personnel continually coordinate flight activities to avoid conflicts with aircraft operating at the airport.

Response to Comment No. 5

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 6

The proposed range expansion is not anticipated to have an adverse impact on "Spirit of Marshfield" helicopter medevac operations. The Marshfield Base Manager has an agreement with Volk Field personnel which includes procedures to ensure that military flight operations will be curtailed, if necessary, to ensure that "Spirit of Marshfield" flights with patients will have direct, unimpeded access to their destination. In addition, Minneapolis Air Route Traffic Control Center personnel assign the necessary priority to "Spirit of Marshfield" flights to ensure direct light routing. The Marshfield Base Manager has also established an excellent working relationship with Volk Field personnel to ensure that problems are resolved as they are identified.

RESPONSES TO COMMENTS

Costs: Page 2-7 admits to a high water table where the landing strip is planned. What would be the approximate financial and environmental costs of building the strip?

Page 2-17 shows distances saved by units using Hardwood rather than other ranges. In actuality, only the Madison unit saves a significant amount. Two units save only a very small number of miles, while two units have to travel farther to get to Hardwood.

I have learned from the officer who schedules flights at Hardwood that a plane may take off for one range then, because of overuse of that range or area weather conditions, divert to an entirely different range. If the comparison figures take such diversions into account, this does not show up on the chart on 2-17, so it is impossible to know how often a unit that is on paper as saving money by coming to Hardwood is actually going somewhere else.

The OARS for the Hardwood expansion notes the following on page 20: "The only apparent advantage (of the Smokey Hill Bombing Range) to this alternative is Smokey Hill's greater size. It has 33,877 acres, which allows for different tactics than on a smaller range." The Final EIS needs to detail the additional tactics available at Smokey Hill, which would still be more than double the size of Hardwood if the expansion went through, so that a complete comparison of benefits and drawbacks can be accomplished.

The section on page 20 of the OARS continues, "The additional flying time and its related costs and effect on available flying and training time would offset the advantage. Another disadvantage would be that the shift of these units would compound existing scheduling problems at the alternate ranges." However, the OARS was issued in November, 1991. Since then, how many Guard units using Smokey Hill have closed down, mitigating the problem? Also, the scheduling officer informed me, there are at least two units who now routinely schedule time at both Smokey Hill and Hardwood, then take advantage of the better one. The questions then arises: why can't the use of Smokey Hill continue?

Livestock: Page 2-30 says that livestock habituation has already occurred in the affected areas. But this does not examine the history of animals new to the area. I have trouble believing that there have been absolutely no complaints because of information given to Citizens United by a veterinarian now practicing in Viroqua who says he saw problems with livestock while he was working in the VR1616 area.

Noise: Page 2-25 admits that one low-level airplane flying directly overhead will make a noise in excess of 100 decibels. Page 4-57 admits that there will be impact on a person seeking solitude at a site at the moment of overflight. Page 2-27 concedes that noise events are rare and "unavoidable adverse impacts," and studies have shown that rare noise events are far more difficult to ignore and adapt to than frequent noise events.

The questions directed to the Environmental Impact Study by individuals have asked about the impact of a single noise event. The questioners have not been interested in average noise. SEL is defined in the Draft EIS, but I have not been able to find a section where it is addressed. Therefore, I have difficulty

Response to Comment No. 7

The exact location or finalized requirement for a landing zone has not been determined. Therefore, any cost estimate would be premature at this time.

Response to Comment No. 8

At this time, no ANG units have changed missions or closed down operations in a way that would alter dramatically the use of Smokey Hill or Hardwood Ranges. Units will still vary their use of these ranges based upon flying hours and training events required. In general, flying hours have decreased while requirements have increased. Both ranges offer differing opportunities for mission accomplishment with Smokey Hill preferred for air-to-ground activity only and Hardwood for air-to-air and air-to-ground simultaneously. Since flying hours and training requirements change, the flexibility and time/cost effectiveness of both ranges is needed by the using units.

Response to Comment No. 9

See response to Comment No. 8.

Response to Comment No. 10

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 11

As recognized in Subsection 4.2.1.1 of the EIS, noise is unwanted sound, and it is one of the most common environmental issues associated with aircraft operations. Data on sound levels created by F-16 aircraft at varying distances have been added to the text of the document. None of these sound levels is loud enough to cause physical harm, but some are loud enough to startle or create annoyance. Noise impacts depend not only on the maximum sound level, but also on how long each event lasts and how often the event occurs. Day-Night Average Sound Levels (Ldn and Ldnmr) are used in the noise analysis because they have been found to best reflect the combined effect of these quantities. Additional information on the use of cumulative noise metrics is contained in Subsection 3.2 and Appendix F in the EIS.

believing the finding that noise will not be a problem, as shown as the table showing day/night averages on 2-26.

Not yet settled: Several sections address issues that are not yet settled. Pages 4-51 to 4-55 indicate that a memorandum of agreement with the Ho-Chunk has yet to be signed. Chloris Lowe's letter and the resolution of opposition of the Ho-Chunk legislature are reprinted in the Draft EIS. At the hearing at Mauston, a Ho-Chunk legislator reiterated that nation's opposition.

The expansion area has not yet been surveyed for undocumented (Ho-Chunk) sites or artifacts. And an understanding has not yet been reached with the Fish and Wildlife Service.

The Environmental Impact Study has been going on since spring of 1995. Why are there no results yet in these areas?

Requirements: Page 2-15 says the "unobligated availability of Fort McCoy cannot meet ANG requirements." The Final EIS should indicate how many times in a year Fort McCoy's range is requested but unavailable.

On pages 1-8 and 2-17, criteria specify that a bombing range be located no more than 100 miles from a unit's home base or from Volk Field. It is begging the question to say that a unit that comes through Volk Field is less than 100 miles from Hardwood because Volk Field is, by definition, less than 100 miles from Hardwood. Thus it is meaningless to say that Hardwood fulfills the mandate for any unit except Madison, for no unit except Madison has a home base that is less than 100 miles from Hardwood.

Scoping Process: Pages 1-11 to 1-12 list the public meetings held during the scoping process. The public meetings held in September, 1997, were held in major population centers. Why were the scoping meetings all held in much smaller cities?

Page 1-12 mentions "several hundred additional comment letters." Exactly how many letters did the Guard receive, how many favored the proposal, how many were neutral and how many opposed the proposal?

This section also says, "Many [letters were received] after the official comment period had expired." However, it is unclear when the official comment period was. The initial deadline was March 21, 1995, but exactly one letter reprinted in the DEIS was received before that date. The very explicit letter from the Fish and Wildlife Service is dated July 11, 1995, which is apparently the earliest that a response to the Notice of Intent could be prepared. I wonder what would have happened if the initial deadline had been adhered to.

Socioeconomic: Page 2-5 states, "Much of the land north of the existing range is sparsely inhabited." But "sparsely inhabited" is in the eye of the beholder. How many people live in the area? How many people live in the restricted area? In the MOAs? And how many have complaints about the current operations at Hardwood?

Page 3-90 states that Volk Field provides 197 jobs. To properly compare and analyze, the Final EIS needs to tell how many jobs are provided by the cranberry farm to be taken over. It also needs to tell how many jobs might be threatened in other cranberry marshes where the increased use endangers

Response to Comment No. 12

Once a course of action is selected by the ANG, a MOU could be developed as part of the Section 106 process for monitoring significant cultural resources in the area of potential ground disturbance. This process is detailed in Subsection 4.9.1.2 of the EIS. There are no MOUs presently pending between the ANG and the Ho-Chunk Nation.

The Ho-Chunk and Menominee Tribes have been contacted and issues relevant to Native American concerns have been discussed. The Tribes have indicated that further consultation would be necessary should the ANG acquire the land. The ANG currently has a coordination system in place with the Ho-Chunk Nation that provides for a 5 NM avoidance area during any of their special observances or ceremonies. This system is on an "as called for" basis and is implemented by NOTAM and direct communication with daily users. Correspondence associated with those coordination initiatives are presented in Appendix O to the Final EIS.

Response to Comment No. 13

Records of requested use and non-availability of Fort McCoy are currently not being kept. However, past experience and knowledge of activities at Fort McCoy indicates that little time would be available for military aircraft training.

Response to Comment No. 14

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 15

In general, the seven scoping meetings locations were selected based on securing available facilities that corresponded to the schedule for the two week scoping meeting period and an effort to provide a wide geographic mix of locations from which the public could choose a meeting to attend. The size of the three towns used for the hearings for the Draft EIS was not a selection factor. Also, both Mauston and Black River Falls were included for both sets of meetings.

Response to Comment No. 16

Because people in opposition to an action tend to be much more active in writing letters, no count is kept of such pro and con numbers. However, all scoping letters received were read and considered in the planning for the currently proposed range expansion project and the preparation of the Draft EIS.

RESPONSES TO COMMENTS

Response to Comment No. 17

Appendices G and H present letters received from Federal and State agencies that provided information used in the preparation of the Draft EIS. Many of these letters provided information in response to specific requests from the Air National Guard or its contractors and are not necessarily linked to the scoping comment period. Some of the responses corresponded with the official scoping period and some were received at a later date. The "many letters" described in the text refers to letters from the general public. The text has been changed to clarify this point.

Response to Comment No. 18

The land north of the range expansion area is primarily located within the Wood County Forest, however, property owned by a cranberry grower and several private land owners is also located adjacent to the northern boundary. Population counts are not available. Population associated with the MOAs is discussed in Subsection 3.12.2, MOA Utilization.

RESPONSES TO COMMENTS

Response to Comment No. 19

The number of jobs associated with the cranberry farm located in the range expansion area is not known. The estimated income produced by a typical cranberry farm with 25 planted acres using 1997 prices is discussed in Subsection 3.12.1.3, Employment and Local Economy. Access into and through restricted airspace for cropdusting flights is coordinated with the Minneapolis Traffic Control Center, and while timing may be affected, cropdusting flights would not be prevented. Tourism effects are unknown, however, recreation access would be limited for safety reasons, but still available on the expanded range. Also, some existing recreational users of the range expansion area may choose to visit the area and use other nearby recreation areas.

Response to Comment No. 20

See response to Comment No. 19.

RESPONSES TO COMMENTS

crop dusting airplanes. The study also needs to explore how many jobs in the tourism industry might be lost, particularly since the Wood County Forest is currently open to hunters and hikers 365 days a year, but would be open only during the 9-day gun deer-hunting season, if the schedule for the current range hold for an expanded range.

Wildlife: The Fish & Wildlife Service made multiple requests and suggestions in its letter, helpfully reprinted in an appendix of the Draft EIS. However, in translating that letter to the document itself, questionable changes were made. For instance, the section on raptors reads: "The US Fish and Wildlife Service typically recommends a distance of .25 mile for avoidance of impacts to bald eagle, osprey, red-shouldered hawk and peregrine falcon nests; bald eagle wintering areas; wildlife in wilderness areas; and colonial birds' nesting sites." However, the letter actually recommends that fixed wing aircraft avoid these sites by "at least a quarter mile but preferably 2,500 feet. Rotary-winged aircraft should avoid such sites by more than 5 miles." The letter also suggests that during certain critical seasons of the year in certain critical areas "flights should be prevented at all times."

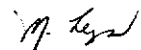
Page 2-30 finds no adverse impacts on wildlife. But the DNR recently published its conclusion that the expansion would adversely affect the expansion of wolves into the area. The Final EIS needs to deal with this.

Page 2-33 says that flight activity over parks and wildlife areas would be restricted. How much flight activity would this push into other areas?

When General Slack briefed Ho-Chunk legislators in January, 1996, he told them he could not absolutely promise that planes would never fly over the casino, senior citizen center, etc. in Nekoosa. Are promises about not flying over wildlife areas equally hard to keep?

I look forward to seeing the requested information and answers to my questions in the Final EIS.

Sincerely,



Marilyn S. Leys

Response to Comment No. 21

Recreational use of the expanded range would be restricted based upon flight schedules but, similar to the existing range, recreation use could still occur both during the 9-day gun deer season and at other times (see Appendix I, Subsection 3.1.7). Also, see response to Comment No. 19.

Response to Comment No. 22

The EIS accurately reflects the USFWS letter in stating that USFWS recommended an avoidance distance of 1,320 feet (0.25 mi) around eagle, osprey, hawk, and falcon nests, bald eagle wintering areas, and colonial bird nesting areas (USFWS 1995). The letter also suggests that flush responses to birds can be minimized by maintaining avoidance distances of at least a quarter mile (preferably greater than 2,500 feet) around known bird concentration areas for fixed-wing aircraft, and up to four or five miles for rotary-winged aircraft. However, the USFWS does not provide supporting rationale for these avoidance distances. The best available information regarding noise impacts to wildlife indicates that, while startle or panic responses to noise do occur in some wildlife species, these short-term responses to subsonic or supersonic noise do not result in long-term impacts, such as increased mortality or reduced reproductive success to wildlife populations. Subsection 4.8.1.3 of the EIS addresses this issue in greater detail.

Response to Comment No. 23

The USFWS expressed concern that the development of ground-based facilities in the expansion area could potentially result in adverse effects to the gray wolf, but emphasized that insufficient data are currently available to make a determination. The EIS states that potential impacts to wildlife (including the gray wolf) would exist, but would generally be low with the implementation of specific mitigation measures.

Response to Comment No. 24

As the comment notes, General Slack did not promise that there would not be overflights of the Nekoosa area. Aircraft overflights of the Nekoosa area currently occur above 7,000 feet AGL. There should be no low-altitude overflights. The ANG is working with Fish & Wildlife and the Department of Natural Resources regarding avoidance of sensitive wildlife areas.

There may be an occasion that an aircraft inadvertently exceeds the boundaries of military training airspace and pass over or near sensitive areas such as Native American properties and wildlife areas. These are not planned events and the ANG works to avoid such occurrences.



CATHOLIC WORKER HOUSE
OF HOSPITALITY

1131 N. 21st Street P.O. Box 05206
Milwaukee, WI 53205 Phone: 344-5745

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Dear Friend,

10-7-97

We have some major concerns. We ask that the Wisconsin forests not be used for bombing ranges. We do not need to pollute our environment thinking that bombing our forests will protect us. Our protection is in God and not in the military. If we follow the law of God to love our enemies and stop violating it by shooting our enemies we will not have to worry about our security. Did Christ not say that even the sparrows and lilies of the fields not need to worry since God loves all? To do training to do violence to our enemies by destroying the environment does good for no one. We ask that you follow the State Statute 28.11 which expressly protects public forests for future generations. Former Attorney General Bronson LaFollette issued an opinion in 1986 that country forest land cannot be used for military purposes. What good is it to protect oneself with violence offending the law of God and suffer the loss of one's soul?

We ask your support for the Mining Moratorium Bill. There is no way to stop the pollution of our waters if you allow mining to be done in our State. If you give in to the wealthy corporation desires to mine you will be looking at future problems with the water which will be very costly to the Wisconsin taxpayers. The same applies to the nuclear power plants in the State since our reliance on these for energy will ultimately lead to much damage to the population and environment of the State since there is no safe and adequate way to store the waste from the plants and will cost the State much money to keep these plants safe even when they can no longer be used. These plants radioactive remnants just cannot be contained. It is wrong and an outrage to our future generations to allow these plants to continue when there are alternative ways of producing energy.

We ask that in the W-2 plan that people be permitted to attend vocational colleges in order to learn a skill and be counted as work hours required by W-2. The reason is that so many of the poor do not have skills necessary to get family-sustaining jobs. They simply cannot raise a family on the unskilled jobs that they must take due to a lack of any particular skill. Instead of locking up the poor we should allow them the opportunity to improve their lives. Many of them are victims of their poor upbringing by their parents. They deserve a chance to do well just as all of us have had that chance.

We would have monies to help people with their basic needs if we did not continue to fund such cold war relics such as the ELF Project and the GWEN towers in our State. We must learn that only teaching nonviolence will lead to justice and a decent life for all the people of the State. Instead, we teach our children that the way to get what you want is to use violence, to build and use weapons to destroy those who keep us from getting what we want. This is the wrong lesson for our people.

Thank you for your attention. We ask God's blessings on your work.

Peace,
Don Zimmerman
for Casa Maria Community

395

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01610

Don

Zimmerman

Written Comment Form

OCT 8 1997

HARDWOOD RANGE EXPANSION AND RELATED AIRSPACE ACTIONS
ENVIRONMENTAL IMPACT STATEMENT

If you would prefer to submit written scoping comments, please use this form to provide comments on the EIS. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Date: Patricia Gray
1475 Baileman Road
 TITLE/ORGANIZATION: P.O. Box 13
Sebec, WI 54413
 ADDRESS: _____
 _____ (Street) _____ (City/State/Zip)

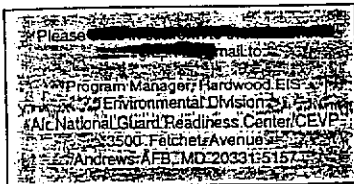
- COMMENTS -

pg 1-1 par. 1.3 Need for the Action. DoD reduce number of bases. I would suggest the A.N.G. to take over at one or more of these bases, where the people want the base to continue and move Handwood out of Wis. Can't the A.N.G. realize after listening to the comments at the hearings that it is the peoples wishes for them not to expand Handwood?

pg 1-2 Two sentences at top of page are contradicting.
 pg 1-2 par. 4 Live ordnance sure sound like live ordnance to me, smoke rising on impact and report of explosives. Once or twice a year we hear and see more than dumbie bombs. Also we now have ground troops occasionally which I request be included in final E.I.S.

pg 2-7 Range usage - 7 A.M. - 10 p.m. with 10% between 10 p.m. - 7 A.M. majority would occur between 6 A.M. - 7 A.M. It looks like 24 hour usage with no time for IT TO BE OPEN FOR RECREATION. This needs to be defined to great explanation in final E.I.S.

pg 2-8 predominantly between sunrise and sunset. Where do you show your 10% night flights? Please include in final E.I.S.



RESPONSES TO COMMENTS

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 2

Explosive Ordnance Disposal teams use explosives to ensure that the training ordnance is free of spotting charges and rendered safe for recycling of the metals. This disposal is accomplished once or twice per year. It is done by hand placing explosives on training ordnance that they suspect may still contain the spotting charges. The explosive force of a spotting charge is roughly the equivalent to that of a 10-gauge shotgun shell.

Response to Comment No. 3

Comment noted. The text has been changed to insert information in the last paragraph of Subsection 2.2.2.1 to clarify that the range (outside of the impact area) is open to the public during periods of non use. Interested parties wanting to enter the range should call (800) 972-8673 to determine if the range is scheduled for use. If it is not scheduled for use, the ANG encourages people to use the land for recreational purposes.

pg. 2-17 Table 2-5 Bottom of chart

Unit Location	Range	Dist.	Approx. Travel Time	Approx. Travel Cost
Hardwood Range	Grayling	245 NM	354 hr	\$942

Please explain where the A.N.G. has a unit at Hardwood.
Also include this in Final E.I.S.

pg 3-24

Last paragraph. This paragraph needs serious updating

Aircraft crashes - (one in Wis. near Holmes) Also the loss of life of the pilot that crashed on the range itself. Please include ALL updating in Final E.I.S.

pg 3-77

Second par. below Table 3-22

With the hours of use spelled out on pg. 2-7 it looks to me that A.N.G. proposes 24 hour usage. When are recreational activities suppose to be allowed. Please state this in Final E.I.S.

Sincerely,

Dale H. Gray

Private Landowner for recreation

Dale or Patricia Gray
7475 Batterman Road
P.O. Box 13
Babcock, WI 54413

RESPONSES TO COMMENTS

Response to Comment No. 4

There are no flying units stationed at Hardwood Range.

Response to Comment No. 5

Aircraft mishaps on the range are addressed in Subsection 3.3.3.1 of the EIS.

Response to Comment No. 6

The proposal does not include 24-hour usage. Table 3-22 applies to recreational land units that will not be affected, except for the County forest lands specifically in the expansion area, which will be restricted for safety reasons.

OCT 9 1997

Dear Sir,

I am a member of the Wisconsin National Guard. You may know someone like me who is in the National Guard. Many are your friends, members of your families, business acquaintances or even your sons or daughters. Most of us are "part time" citizen soldiers and airmen who also have "full time" jobs, and raise families within our communities.

As you know, there is currently an Environmental Impact Statement (EIS) being done for a modest expansion of the Hardwood Range. A small addition of ground space is needed to allow pilots to train for changing situations. Including scenarios where they are protecting us on the ground.

Army and Air National Guard units are serving in dangerous areas today where that training is crucial. Wisconsin's own 115th Fighter Wing, located in Madison, recently returned from Turkey after serving as the lead Air Force fighter unit enforcing United Nation's imposed sanctions in the skies over Iraq. They will again fly in that dangerous area of the world later this year. The 115th is the primary user of Hardwood Range, flying over half of all training flights in the area.

Congressional leaders have told the National Guard that our involvement in world wide operations will remain at this high level, and, could possibly increase as the active duty faces further budget cuts. This places a premium on training that can be accomplished close to home. Local training reduces the amount of time spent away from families and jobs. The additional stress of multiple deployments combined with training at other locations is already causing members to leave the guard.

There are multiple costs associated with the loss of these members. First, we as tax payers have a great deal invested in training these men and women to perform their jobs at the high level they do. For example, it takes over two years and costs one to two million dollars to train a pilot to the point where they are combat qualified. To continually have to retrain people is expensive and time consuming. Second, that is a loss of experience that can never be regained. The greatest source of knowledge any of us can enjoy is sharing time with people who have experienced events themselves.

There are people opposed to this expansion. There are also those of us who support this proposal. I believe that the modest expansion of the Hardwood Range is an investment in the future, for you and I as tax payers and especially for our sons and daughters who will serve in the future.

Thank you.



RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

October 11, 1997

1307 South Mountain Road
Wausau, WI 54401

Program Manager, Hardwood EIS
Environmental Division, Air National Guard CEVP
3500 Fetchet Avenue
Andrews AFB, MD 20762-5157

Dear Sirs:

I am writing to express my opposition to the Wisconsin National Guard's proposed expansion of the Hardwood Air-to-Ground Bombing Range in Northern Juneau County into Wood County forest land.

I understand that the recently released Draft Environmental Impact Statement does not clarify what impact the expansion will have on the land or wildlife in that area.

I am especially concerned about the dangers to wildlife. Species found around and in the expansion area are listed as endangered and threatened. These include: wolves, bald eagles, peregrine falcons, Kirlands warblers and the Karner blue butterfly. Long-term exposure to loud aircraft noise will effect nesting periods of specific bird species. Wolves are reclusive animals. This is their habitat range.

Citizens of Central Wisconsin do not want to lose the land and all its recreational and economic opportunities. People living near-by fear that expansion will increase flights and noise pollution. As an alternative, there are areas of the American Southwest that the government already owns and uses for Air Force training.

Do not invade our county forests in Wisconsin. Defend our nation, just do not take our forests to do so.

Thank you for your consideration.

Sincerely,



Judith A. Larsen

c: Department of National Resources secretary George Meyer
U.S. Senators Russ Feingold and Herbert Kohl

RESPONSES TO COMMENTS

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 2

The Draft EIS has sections on Land Use (Subsection 4.10) and Biological Resources (Subsection 4.8) that discuss potential impacts associated with the Proposed Action.

Response to Comment No. 3

The ANG has been and will continue to work with the U.S. Fish and Wildlife Service, the Wisconsin Department of Natural Resources, and other regulatory agencies to exchange information and study the effects of their actions on threatened and endangered species within the areas affected by its operations. The ANG will continue this cooperative effort and adjust its operations should any information become available that would identify potential impacts on any threatened or endangered species or other wildlife.

Response to Comment No. 4

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

TERRACE VIEW CAMPSITES

W5220 Terrace View Road
Tomahawk, WI 54487

Phone (715) 453-8352

RESPONSES TO COMMENTS

October 13, 1997

Program Manager
Harwood EIS Environmental Division
Air National Guard CEVP
3500 Fatchet Avenue
Andrews AFB, MD 20762-5157

RE: HARWOOD PLAN OF EXPANSION-WOOD COUNTY

Gentlemen:

Since I have just recently been informed of a desire by the Air National Guard's request to expand operations in Wood County, I would like to address my concerns as a concerned citizen for the well being of our wonderful state of Wisconsin. Only since the past 2 years have I become more educated on the issues of growth vs environment, and the problems our municipalities have with zoning and critical decisions facing us due to growth and expansion. I am referring to an article read in the City Pages of Wausau, WI.

In the past, I have been involved with Timber Wolf Alliance as a co-presenter on the importance of wolves and our eco-system. Due to a zoning and development request in my immediate residential area, I have become more aware of critical areas needing some protection and intervention by citizens. In this article, many reasons for protection and declaring this off limits for this specific request by the ANG is given. Therefore, I, as a concerned (senior) citizen am writing in protest to the ANG request of expansion in this region of the Harwood Range of Wood County.

Certainly with the DNR and the Bureau of Endangered Species, as well as other organization who must speak out for that which cannot, all have deep concerns of our Air National Guard's request in this specific issue.

Please count me and my husband, a retired chemistry teacher, with those who vehemently oppose this specific expansion project request.

Respectfully,
Ken & Lin Kenworthy

Ken



1995 - Year of the Grandparent

Located On
Beautiful Muskegon Lake
Hwy. 8

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

400

02010

Ken
Lin

Kenworthy

Written Comment Form

OCT 13 1997

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

RESPONSES TO COMMENTS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Mr. Daniel J. Smallbrook
TITLE/ORGANIZATION: Bellows Knight Snowmobile Club
ADDRESS: 5531 Griffith Ave Wls Rapids WI 54494
(Street) (City/State/Zip)

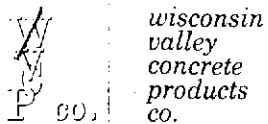
-- COMMENTS --

In Regards to your proposal to expand the Hardwood Range, I would like to voice my opinion. Number 1 and foremost, I'm totally against this expansion. This is no good reason for you to take away hundreds of acres of property that can be utilized in a much more positive way, just so the fly boys can play war games. If they want to expand to play their games then ship them off to Arizona or New Mexico, out in the desert, where its all waste land! they want be taking away a positive recreational area. This property is utilized not only for hunting, but there are also snowmobile trails that run thru this area that the snowmobile clubs have worked long & hard to establish for everyone's enjoyment. This country is becoming more & more against the people who use their recreational lands for their fun & enjoyment. Its time to put a stop to it.

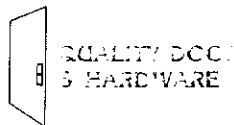
Please hand this form to the staff, drop into the collection box, or mail to:
Program Manager, Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fitch Avenue
Andrews AFB, MD 20762-5157

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).



P.O. Box 668
Wisconsin Rapids, WI 54495-0668
(715) 423-7500
FAX (715) 423-8616 WATS 800-472-7301
PLANTS LOCATED AT:
Wis. Rapids, Oxford, Wautoma, Westfield, Adams



RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

October 15, 1997

Air National Guard Readiness Center
Program Manager, Hardwood Range EIS
ANGRC/CEVP
3500 Fetchet Avenue
Andrews Air Force Base, MD 20762-5157

I, the undersigned member of the Wisconsin Rapids Area Chamber of Commerce and the River Cities Development Corporation, would like to voice my opposition to the proposed expansion of the Hardwood Bombing Range in the Wood County area.

There are no benefits for Wood County should the range be expanded as proposed, yet there are serious negative impacts. Wood County and the State of Wisconsin will lose over 6,000 acres of irreplaceable forestland currently being used for recreation, wildlife habitats, wetland preservation and timber production. Furthermore, attempts by Wood County to identify replacement lands have been met with persistent, severe opposition. Each taxpayer in Wood County will sustain severe losses from any action that diminishes our ability to attract, retain, or expand existing business and industry. The proposed expansion will lower the quality of life enjoyed by residents of our County.

The people of Wood County and members of the Wisconsin Rapids Area Chamber of Commerce and River Cities Development Corporation have aggressively fought to continually improve our area and will continue to do so.

Sincerely,

WISCONSIN VALLEY CONCRETE PRODUCTS COMPANY

Steven G. Knorr
President



Wisconsin Rapids Area Chamber of Commerce

October 15, 1997

Air National Guard Readiness Center
Program Manager, Hardwood Range EIS
ANGRC/CEVP
3500 Fetchet Avenue
Andrews Air Force Base, MD 20762-5157

The Board of Directors of the Wisconsin Rapids Area Chamber of Commerce, today voted unanimously to go on record in opposition of the proposed expansion of the Hardwood Bombing Range.

It is evident that there are minimal economic benefits for Wood County and our membership should the range be expanded as proposed, yet there are serious negative impacts. Each member of the Wisconsin Rapids Area Chamber of Commerce will sustain severe losses from any action that disintegrates our ability to attract, retain, or expand existing business and industry.

The people of Wood County and members of the Wisconsin Rapids Area Chamber of Commerce have aggressively fought to continually improve our area and will continue to do so.

Sincerely,

D. Bruce Trimble
President

cc: David Draves

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

403

1120 Lincoln Street
Wisconsin Rapids
WI 54494-5229
(715) 423-1830
800-554-4484
Fax (715) 423-1865
E-mail: chamber@wrtc.net



RESPONSES TO COMMENTS

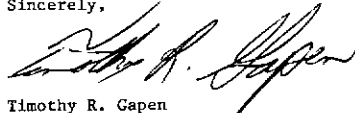
October 16, 1997

Dear Sir,

This is a protest letter against the expansion of the Hardwood Bombing Range in Wisconsin. Please take your noisy low flying planes someplace else. Please do NOT take anymore of our land, especially the wooded land. Let's see if you fly-boys can't get by without this proposed expansion. You know it's bad for the environment yet you continue to try to run this expansion down our throats. Even your environmental impact study is padded to the point of making it almost impossible to read and comprehend the contents.

Please don't move any more Wisconsin residents so as to provide more area for the bombing range.

Sincerely,



Timothy R. Gopen
1042 So. Biron Drive
Wis. Rapids, WI 54494

For a change - Please listen!

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Every effort has been made to make this EIS as understandable as possible, while still providing the appropriate scientific analysis to allow decision makers to make informed decisions. In accordance with guidance from the Council on Environmental Quality, simple summary information is presented in Section 2, details of the impacts are presented in Section 4, and more complex analyses are offered in the appendices. Each reader may choose to read the level of analysis that is appropriate to his or her interest with the subject matter.

RESPONSES TO COMMENTS

Nelson A. Moffat
1211 West 8th Street
Marshfield, Wisconsin 54449-3522

October 16, 1997

Program Manager
Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fetchet Av.
Andrews AFB MD 20762-5157

Dear Sir,

I write to express my opinion regarding the expansion of the Hardwood Bombing range in Central Wisconsin.

My main concern is the change in the airspace surrounding the Marshfield airport. I feel it would make air operations from this airport much more difficult, and adversely effect the emergency helicopter flights from and into St. Joseph's Hospital in Marshfield.

I do not favor the expansion for these reasons.

Sincerely,



Nelson A. Moffat
cc: Paul Westergaard
PO Box 8095
Wisconsin Rapids WI 54495-8095

Response to Comment No. 1

The proposed range expansion is not anticipated to have an adverse impact on "Spirit of Marshfield" helicopter medevac operations. The Marshfield Base Manager has an agreement with Volk Field personnel which includes procedures to ensure that military flight operations will be curtailed, if necessary, to ensure that "Spirit of Marshfield" flights with patients will have direct, unimpeded access to their destination. In addition, Minneapolis Air Route Traffic Control Center personnel assign the necessary priority to "Spirit of Marshfield" flights to ensure direct light routing. The Marshfield Base Manager has also established an excellent working relationship with Volk Field personnel to ensure that problems are resolved as they are identified.

1

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

4421 Deer Rd.
Wisconsin Rapids, WI 54494
October 17, 1997

Program Manager
Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fetchet Ave.
Andrews AFB, MD 20762-5157

We are writing to voice our opposition to the expansion of the Hardwood bombing range in Juneau/Wood county, Wisconsin.

Our reasons for the opposition are many, including the negative impact on the environment, the increase of the noise level associated with the range expansion, the loss of public lands, the negative effect on residents of our area, and the unwillingness of the ANG to consolidate current military properties with other branches of the military.

We believe there is simply no benefit to residents of Wood county for this range expansion, and further wish to express our desire for the range to be closed and operations moved elsewhere. We believe that the time has come for the military to make use of its current facilities which may be not utilized to their fullest potential. There is no need to steal more property from citizens when the military already has acres and acres in its possession which could be studied and used for this purpose.

Dennis & Jean Flathom

Dennis and Jean Flathom

October 19, 1997

Air National Guard Readiness Center
Program Manager, Hardwood EIS
ANGRC/CEVP
3500 Fatchet Avenue
Andrews Air Force Base, MD 20762-5157

Sir:

I'm writing in response to the DEIS on the proposed expansion of the Hardwood Bombing Range and related airspace.

According to Air National Guards press release the southern Wi. and Western Ia. M.T.R.s were dropped from the proposal due to environmental concerns. It would seem some of these overwhelming environmental problems that caused the pull out even before the DEIS was finished would also pertain to the Hardwood Bombing Range and related air space. But in the DEIS none of these environmental problems are acknowledged or addressed.

If taxpayers are to get their monies worth for the close to 1,000,000 dollars that was spent on the DEIS before the low level corridors were withdrawn they need to see the studies that made it so abundantly clear to ANG that the environment would be detrimentally effected by the low level flights. The DEIS says that there will be no "significant impact" on the environment of the proposed bombing range expansion or related airspace expansions. However, real research and thorough studies are not shown in the DEIS, and in many important areas "consultations are ongoing." So how can individuals respond constructively? For these reasons I oppose the expansion of the Hardwood Bombing Range and related air space.

Sincerely



Glenn Donovan R.R.1 box 21 b Ferryville Wi. 54628

RESPONSES TO COMMENTS

Response to Comment No. 1

As a result of the public input through the scoping process associated with the Draft EIS, Air National Guard planners obtained information identifying the locations of potentially sensitive areas not previously identified during the DOPAA development process. Much of this public input focused on resources associated with the proposed new southern and southwestern MTR corridors. In consideration of potential environmental impacts to these locations (the Kickapoo Valley area as an example), it was immediately apparent that operational limitations on aircraft activities would need to be adopted for training scenarios in these areas. This determination subsequently led to the conclusion that the proposed southern and southwestern MTR corridors would not represent viable training opportunities that would justify the charting of the new low-level routes. Consequently, the proposals were dropped and plans to complete detailed environmental studies of the proposed new low-level MTR corridors were terminated and no studies were produced. The factors that influenced this decision for the proposed new MTR corridors were not applicable to the existing airspace associated with the range. Furthermore, in light of the operational limitations associated with the proposed new routes, the Air National Guard has no plans to pursue the establishment of the proposed southern and southwestern MTR corridors.

RESPONSES TO COMMENTS

October 19, 1997

Air National Guard Readiness Center
Program Manager, Hardwood EIS
ANGRC/CEVP
3500 Fetchet Avenue
Andrews Air Force Base, MD 20762-5157

Sir:

I'm writing in response to the DEIS on the proposed expansion of the Hardwood Bombing Range and related airspace.

Overall, the DEIS fails to address many specific environmental concerns directly. In some areas, "consultations are ongoing". How can we comment on research and consultations if they are not included in the DEIS?

Further, the DEIS states inadequate research as reasons to conclude "no significant impacts". If research is inadequate and some research has indicated potential problems, those problems must be addressed in the EIS. Specifically I will point out some of the areas of inadequacy that I found and request that each be fully addressed in the EIS.

ASSESSMENTS: Request that the term assessment be accurately defined in the EIS, and that the phrase, "worst case scenario" be dropped from the document. The phrase "worst case scenario" is used at least six times to refer to the proposed assessment levels of use of the Hardwood Bombing Range expansion and related airspace use. According to LTC Gunther Neuman of Volk Field, assessments are "best guess estimates". Citizens United Against Low Level Flights learned this at a meeting with representatives from the Federal Aviation Administration and Air National Guard on January 8, 1997. Further, the ANG acknowledged that MOA Falls One and MOA Falls Two are being used 6 and 8 times more respectively than their original assessments. (Hardwood Range and Related Airspace Proposal Information Sheet, August 1996). To use the phrase "worst case scenario" is to imply that assessments are absolute amounts. If the ANG wants to use subjective language, a realistic "worst case scenario" would be 8 times the proposed assessed levels of use, with no public input with the increases.

COSTS: Request that the costs of present training (as in Table 2-5, p. 2-17) be compared to the projected costs of all the expansions proposed in the DEIS. Other projects around the country could offer a realistic cost projection. To suggest that these pilot travel costs to use other military fields will be "saved" by the expansion is erroneous. The ANG must figure the real costs of the expansions into the scenario.

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 2

The use of other training areas was examined as part of the development of the alternatives studies in the EIS and is given in Subsection 2.3.2. The proposal was designed to minimize conflicts with potentially sensitive areas while providing the training resources necessary to meet military readiness requirements. Because of limited fiscal resources and aeronautical constraints, virtually all of our nation's fighter units train in airspace that is within a "tank of gas" of the aircrews' home station. No benefit-cost information for nationwide training options are available.

RESPONSES TO COMMENTS

THE USE OF PRESENT FACILITIES TO JUSTIFY EXPANSION:

Request that present facilities are not used to justify expansions. "Technological improvements at Volk Field Combat Readiness Training Center (CRTC), such as Air Combat Maneuvering Instrumentation (ACMI) system make it possible for military flying units to accomplish a broad range of training..." (DEIS 1.3). Expansions must stand on their own in the DEIS process.

NOISE: Request that other available programs, namely ASAN be used to calculate noise. Noise averaging methods which assume an urban environment base level is inaccurate in a rural Wisconsin area. Further, NOISEMAP model ignores other available models, most notably ASAN. This program rejects continued use of the DNL metric for assessing human annoyance. ("ASAN", paper by Paul Sharp of Armstrong Laboratories, Wright-Patterson AFB, P. 8).

WET LANDS: Request that thorough research be done on all contaminant possibilities to surface and ground water. Most of the area of the proposed Hardwood Bombing Range expansion is wet lands. Yet just 3½ pages (DEIS 4.6) concludes there will be "unavoidable impacts to water resources" in construction, but no other impacts to water resources. Roads, drainage, and bomb contaminants will cause ongoing water contaminants and serious changes in the wet lands environments. These are written off because its "difficult to predict" (DEIS 4.6.2.5). Difficult means real study is needed, not "no adverse impacts" (DEIS 4.6.4). Further, here is an area where the questions raised by the DNR and USFWS are not answered, so we cannot comment on them. The questions raised by these agencies must be answered in the DEIS (see Appendix G for DNR and USFWS letters).

LAND EXCHANGE: Request that the EIS fully address the proposed land exchange for the proposed Hardwood Bombing Range expansion as requested by the DNR (p. 4, DNR letter, appendix G).

CONTAMINANTS AND TOXIC MATERIALS: Request that studies done by the Air Force and Army and independent agencies be included. Chaff, in particular, "poses no known risk to humans or animals." (DEIS 4.3.2). Yet the Nevada Division of Environmental Protection claims studies are inadequate. Further, the Air Force documents lack of information saying "There is no documentation of human exposure studies to chaff." ("Identifying and Evaluating the Effects of Chaff from Military Aircraft"). In 1992 the Army concluded "there is a persistent risk of fiber inhalation and mitigation efforts will likely be required for areas containing high fiber content." The comments of these agencies that studies are needed is not the same as "no risk". Titanium Tetrachloride used in signal charges is classified as a poisonous gas by the US Department of Health and Human Services and as a Hazardous Substance by the Department of

Response to Comment No. 3

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 4

The Assessment System for Aircraft Noise (ASAN) model and the MR_NMAP model (which was used for this assessment) base all of their calculations on the Air Force's NOISEMAP technology. The basic algorithms used in both programs are similar to those used in the ROUTEMAP model, which was designed specifically to model noise on military training routes. Therefore, while ASAN does have expanded data reporting potential, basic noise level calculations are similar.

The procedures used to determine aircraft noise exposure and its results represent the best available technology. All aircraft operations presently occurring, and proposed to occur were considered. Noise was computed using the Air Force's MR_NMAP software, which bases its calculations on the same physical principles used for aircraft noise analysis throughout the world, and was specifically validated for military airspace operations. Data incorporated into the Air Force's noise models are widely accepted by the scientific community, and the Air Force regularly participates in various scientific organizations to ensure that the best available data and methods are used.

RESPONSES TO COMMENTS

Response to Comment No. 5

The ANG firmly commits to not impact wetlands in development of the proposed expansion area; however, Executive Order 11990 which calls for "no net loss of wetlands" does not preclude the development of projects within a wetland as long as no practicable alternatives exist and that the proposal includes all practicable measures to avoid wetlands impacts. Assuming the expansion is approved, the proponent would be required to obtain an individual Clean Water Act Section 404 permit for any activities occurring within wetlands or other waters of the United States. Issuance of a Section 404 permit requires a demonstration that the Section 404 (b)(1) Guidelines have been followed. The Guidelines require that the project avoids and minimizes impacts to wetlands to the extent possible and provide mitigation for unavoidable impacts. Once specific designs and locations for the landing zone, drop zone, and target area(s) are available, the ANG will conduct jurisdictional wetland delineations to facilitate the assessment of specific project components (and alternatives) on wetland resources, as applicable. Subsection 4.6.2.4 of the EIS discusses requirements under Executive Order 11990, Protection of Wetlands, Section 404 of the Clean Water Act, and Chapter NR 299 of the Wisconsin Administrative Code.

Response to Comment No. 6

As of this publication, the Air National Guard has not received any proposals that could be construed as an approach to provide alternate lands that could replace lands lost if the Department of Defense approves the range acquisition, as outlined in Section 1. If the acquisition occurs, it is anticipated that a majority of the forest lands and agricultural uses would remain as they exist today. If the Department of Defense approves the acquisition, depending on how it is accomplished (i.e., fee simple purchase, leasing from owners or the State, license, etc.), replacement lands would be an action that the State of Wisconsin or Wood County could address, as appropriate.

RESPONSES TO COMMENTS

Response to Comment No. 7

Chaff consists of very small fibers of aluminum-coated mica that reflect radar signals and, when dispensed from an aircraft, form a cloud that temporarily hides the aircraft from radar detection. Although the chaff may be ejected from an aircraft using a small pyrotechnic charge, the chaff itself is not explosive. Chaff is composed of silicon dioxide fibers ranging in diameter from 0.7 to 1 mil (thousandth of an inch), coated by an aluminum alloy and a slip coating of stearic acid (fat). Analyses of the materials comprising chaff indicate that they are generally non-toxic in the quantities used. Silicon dioxide is an abundant compound in nature that is prevalent in soils, rocks, and sands. The trace quantities of metals included in the mica fibers are not present in sufficient quantities to pose a health risk. Aluminum is one of the most abundant metals in the earth's crust, water, and air. In general, aluminum is regarded as non-toxic. Trace quantities of silicon, iron, copper, manganese, magnesium, zinc, vanadium, or titanium may be found in the alloy. The quantities involved are a minuscule percentage of levels that might cause concern. Stearic acid is found naturally as a glyceride in animal fat and some vegetable oils. Chaff has also been test-fired in a controlled environment to determine its potential to break down into respirable particulates, and the findings of the test detected no such result. The potential for chaff to affect soil and water is remote. Laboratory tests of chaff, using a modified toxic characteristics leaching procedure, indicated little or no potential for adverse effects on soil. No adverse impacts on biological resources have been identified. Based on their digestive processes, few animals are expected to suffer physical effects from chaff ingestion. Effects from inhalation are not considered a significant issue, since chaff particles would represent a small percentage of the particulates regularly inhaled by animals. Impacts on land use and visual resources are directly related to the visibility and accumulation of chaff debris. Field studies of the visibility of chaff and incidental debris in different environmental contexts concluded that significant aesthetic effects are unlikely.

RESPONSES TO COMMENTS

Response to Comment No. 8

The "cold spot" spotting charge used to aid scoring accuracy of training ordnance contains approximately 17 cubic centimeters (cc) of titanium tetrachloride. When exposed to the atmosphere, a non-thermal chemical reaction occurs between the titanium tetrachloride and moisture in the air producing a smoke-like plume. The plume persists for 15 to 30 seconds depending on the moisture content of the air and the wind velocity. Subsection 3.4.1 of the EIS identifies titanium tetrachloride as an irritant to the skin, eyes, and mucous membranes. If a person were immediately adjacent to a cold-spot discharge, he or she could experience such irritation. However, since all persons are excluded from target impact areas when the range is in use, it would be impossible for any such exposure to occur. The small quantities of the substance in training ordnance and the byproducts produced are rapidly dispersed and neutralized. Quantities are insufficient to create even minor human health concerns or impacts to wildlife.


Transportation and US Environmental Protection Agency. It is toxic to humans and animals. The DEIS fails to address its toxicity. The Defense Installation Restoration Project located at Hardwood has a "small plume of contaminated ground water" identified in 1995. Yet "No monitoring is currently being performed at the site." (DEIS 3.4.1). Both monitoring and correction is needed at this site. How much more wastes will be created with the construction and use of the proposed expansions? How will these wastes be dealt with? How much pollution will they create?

WILDLIFE: Request that more and different studies be included to understand the effects on wildlife. The Ellis study was done on adult birds for one year. The next year jet flights increased and follow up studies were not done to note the effects on young birds with more flights. Obviously this is a very limited study to use to suggest that raptors will not be too adversely affected. (DEIS 4.8.1.3) In addition, suggesting that avoidance of roosting areas is a solution ignores the fact that roosting habits change daily and weekly according to weather. Thus the avoidance suggestion is impossible.

I request that all questions and requests raised in this letter be addressed in the final EIS.

Sincerely,

Edie Ehlert
RR1 Box 21 B
Ferryville, WI 54628



RESPONSES TO COMMENTS

Response to Comment No. 9

Only one defense Installation Restoration Project is located on the range. This site was used from 1976 to 1988 for annual burning and burial of spent munitions. Volatile organic compounds and semi-volatile organic compounds were detected in some samples. An IRP Feasibility Study for five sites (4 at Volk Field and one at Hardwood Range) was developed and has been recently (March 1998) released for public comment. The IRP site is located in the southwestern portion of the range approximately 0.5 miles from either border. A map has been included in the FEIS. Neither the existing range nor the proposed range is a superfund site. The text has been modified to include this information.

Response to Comment No. 10

Subsection 4.8.1 of this EIS discusses noise impacts to wildlife. There is evidence in the scientific literature that startle or panic responses to noise do occur in some wildlife species. However, existing studies suggest that these short-term responses do not result in long-term population impacts. A study conducted in North Carolina concluded that "the low response rate of waterfowl behaviors to the presence of aircraft in this study suggested that waterfowl either did not perceive the aircraft as a stressor, or that they became habituated to the presence of aircraft due to repeated exposures over time" (Fleming et al. 1996). Also, the same study found that nesting rates, nesting success, the number of eggs laid, the number of eggs hatched, and nest desertion rates were the same in areas with aircraft overflights and areas without aircraft overflights. However, the study did find that duckling exposed to airport-related aircraft noise grew slower and weighed 4.6 percent less than ducklings not exposed to noise. The existing noise levels and any changes in noise should the proposal be implemented, do not result in the levels of noise related to airport activity. As reported in the study conducted by Ellis et al. 1991, low-level overflights and mid- to high-altitude sonic booms did not have long-term adverse impacts to nesting raptors (refer to Subsection 4.8.1.3).

For species that may not reuse nesting sites or have multiple roosting or nesting sites, avoidance of known bird concentration areas may not be feasible. However, as discussed above and in Subsection 4.8.1.3 of the EIS, intermittent overflights of bird nesting or roosting areas are unlikely to result in long-term adverse impacts to raptors, waterfowl, or other birds.

Program Manager
Hardwood EIS
Envi. Division
A.H.B.

20 OCT 97

RESPONSES TO COMMENTS

Subject: Hard Wood Range Expansion:

as a 60 Year resident of South Wood County and a
air Force Veteran: I can say that I am opposed
to another Hard Wood Range Expansion:

My main reasons for opposition:

1. as a A.F. Veteran I know how many bases were closed since the
1950's. this is a time for deescalation not expansion:
use an existing or closed base.
 2. Noise pollution: We get enough noise pollution including
sonic booms from the A.N.G. planes & W. don't need more
 3. Loss of another 6000 acres of County land to expansion.
We are against this. this land is used by my
self & family as an area of out door activities. the population
of Wood County will not shrink in the future but this population will
only expand - only outdoor land will shrink - God Doesn't make
it any more.
 4. Road closing's:
With another expansion - the Bathorus and County line Rd's will
close. in our area there are our only close alternate roads
when Hwy 173 is closed for repairs.
- I am unhappy that my past letters of opposition to an Expansion
no longer count - so I am again stating - I am opposed.

George H. Carlson
1121 Section St
Neboosa Wis
54457

20 OCT - 97

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No.2

All comments received during the scoping process associated with this EIS were considered in the preparation of the document. Such comments, as they relate to the proposal, have helped to improve the EIS process and have become a part of the administrative record for the proposal.

Written Comment Form

OCT 20 1997

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: ED EMERSON

TITLE/ORGANIZATION: _____

ADDRESS: P.O. Box 361 Hillsboro, WISC. 54634

Please send me a final draft of the EIS. This is an official Request.
-COMMENTS-

I AM OPPOSED TO USING PUBLIC LANDS FOR military purposes. I would like to see the forest returned to the county/state and not used to expand a bombing range. I am a supporter of the military and deeply appreciate of the role our military has played in respect to liberating oppressed peoples - especially in eastern Europe. However, I feel that we can utilize enhanced computer and other technologies that will enable our pilots to practice in real world simulated conditions much better than the hardwood range. I also feel there are more appropriate military facilities already existing. I would like to see the military use the space they have and return the public forest to a use more conducive to its original intent. It is my wish that the military be given technologies that will ensure our readiness while enabling a return of the public forest lands. At a minimum, I would like to see a portion of the existing lands returned to public use.

Thank you and Sincerely,

ED EMERSON

Please hand this form to the staff, drop into the collection box, or mail to:

Program Manager, Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fletcher Avenue
Andrews AFB, MD 20762-5157

RESPONSES TO COMMENTS

Response to Comment No. 1

The use of flight simulators for pilot training is already part of the training program for various aircraft using the affected airspace. The F-16 training regulation (AFI 11-F16) stipulates those activities that may be accomplished using simulators and those requiring actual flying. Although flight simulators work well for certain types of training (e.g., emergency procedures and instrument training), the complete substitution of simulator training for all flight training is not a viable alternative. In addition, the availability of simulators for on-going readiness training is limited.

Response to Comment No. 2

The use of other training areas was examined as part of the development of the alternatives studies in the EIS and is given in Subsection 2.3.2. The proposal was designed to minimize conflicts with potentially sensitive areas while providing the training resources necessary to meet military readiness requirements. Because of limited fiscal resources and aeronautical constraints, virtually all of our nation's fighter units train in airspace that is within a "tank of gas" of the aircrews' home station.

Response to Comment No. 3

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

415

C.D. Gov Thompson (Congressman Obey, Senator Kohl, Senator Feingold)

0301 O

F4

Emerson

Oct. 20, 1997

Program Manager, Hardwood EIS,

I'm writing in regard to the proposed expansion of the Hardwood Range. I live in the area where these jets fly over. I don't want to see expansion or more air traffic in our area. We already have low flying jets & some of the patterns they fly are only tree top high. We have been experiencing sonic booms this summer & fall that are enough to shake the whole house. Please think of expanding where it will affect less people.

Sincerely,

Christine Goodness
1194 Kimball Dr.
Nekeosha, Wis. 54457

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Opposing Hard Wood Bombing Range
Important

OCT 20 1997

Be sure to read this letter

I oppose the expansion for the same
reasons the county opposes it
to whom it may concern.

Why do you need more land,

(our land)? You are doing alright now

with the land you have. Are you
people from Russia or China? I'd like

to know? Everything is government
owned and you want United States

The same way? Are you an American?

How do you get so much power I'd

like to know. I'm sick and tired of

this fighting over this bombing range.

Nobody that I talked to is for it,

don't you listen to the people's wishes?

God will take care of you!

Yours Truly

Gerald & Bernette Redmond

Please leave us alone!



GERALD REDMOND
4721 COUNTY ROAD V
PITTSVILLE WI 54466

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

RESPONSES TO COMMENTS

Oct 30, 1997
Wis Rapids, Wis.

Program Manager
Hardwood EIS
Air National Guard
Readiness Center /CEOP
3500 Fitchet Ave
Andrews AFB, MD
20762 - 5157

Dear Sir:

We are very much opposed to the expansion of the Hardwood bombing range. The military should use an existing range or base instead of taking more than 4,000 acres of Wood County forest and privately owned land. It is a waste of taxpayer money to expand the range here. We oppose the expansion for the same reasons the County opposes it. Losing 6000 acres of forestland in our back yard is a big concern and we don't want to lose it. They are not making any more forestland.

Jack and Marge Schenk
480 Grove & Lincoln SE Corner
(715) 421-0348
Wis Rapids, WI 54494-6259

Yours truly,
Jack and Marge Schenk

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

October 21, 1997

Larry and Pamela Hilgendorf
330 Jefferson Avenue
Port Edwards, WI 54469

Program Manager, Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fetchet Avenue
Andrews AFB, MD 20762-5157

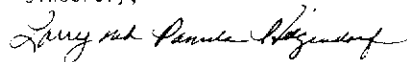
Dear Program Manager,

This letter is to inform you that we are adamantly opposed to the expansion of the Hardwood project in Wood County. It is a waste of our tax dollars to expand the range here while closing other military facilities.

In addition, our tri-city area is supported by our paper industry which would stand to lose 6,000 acres of forestland with this expansion.

Please find other avenues to explore and expand upon. Leave Wood County forestland intact!

Sincerely,



Larry and Pamela Hilgendorf

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

To: Program Manager, Hardwood E.I.S.
Environmental Division, Air National Guard Readiness
Center
CEVP

To: Paul Westergaard

From: Tony and Joyce Jaromin

RE: Opposition To Hardwood Bombing Range Expansion

Date: 10/21/97

As business owners located in a direct Low Level approach zone to the Hardwood Range, we strongly oppose it's expansion. The noise levels can be extremely high and sometimes dangerous for personnel working and living on our cran berry marsh. We have employees with small children who reside on our property who must continually adjust nap times, close windows, and rush children indoors, to avoid the scream of an F-16 fighter at 300 ft.

We also do not see the wisdom of our County losing 6000 acres of it's forest crop land, to the expansion of the range. We feel, as do many of our neighbors, that there is a better way of increasing training flights than taking our county land and forcing this expansion down our throat's. This is the era of reduced military spending and base closings, not expansion that's unnecessary and unwanted by the majority of people it will directly affect.

Tony Jaromin
Joyce Jaromin

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No.2

Training for potential military conflict in time of peace is a reality recognized by the Congress and the President. As military forces are cut back, the quality of training for existing forces must be maintained and improved to ensure our nation has an effective military. As the active duty military force is reduced in size, the ANG role in the total force structure is increasing. Over the past several years, the DOD has conducted studies to evaluate mission readiness and cost effectiveness of its total force. In comparison to DOD regular components, the ANG has relatively low operating costs and provides a cost effective investment.

OCTOBER 22, 1997

PROGRAM MANAGER, HARDWOOD DEIS
ENVIRONMENTAL DIVISION
AIR NATIONAL GUARD READINESS CENTER/CEVP
3500 FETCHET AVENUE
ANDREWS AFB, MD 20762-5157

The purpose of this letter is to state the opposition of the River Cities Development Corporation and its members to the expansion of the Hardwood Range in Wood County. The Corporation fully and completely supports the position of the City of Wisconsin Rapids and Wood County who are opposed to the expansion for economic and quality of life issues. The Corporation also finds the DEIS to be either inadequate or completely lacking in addressing issues of concern to the economic future of this area.

River Cities Development Corporation is in agreement with the City and County objections based on the following:

1. The expansion will further add to air transportation problems suffered by this area. Local businesses are dependent on private aircraft flying out of Wisconsin Rapids to bring in management, customers, technicians, etc. The deterioration of the flight paths, as proposed, will add extra burdens to these firms in terms of flight times and extra refueling stops. This will also impede our ability to attract new companies that depend on such air service.
2. Once the 6,162 acres are removed from the public domain, they will in all probability not be able to be replaced, especially as one contiguous piece. The County has held this property in trust for its residents since the 1940's.
3. The timber on this property will never be able to be harvested once it is contaminated by metal fragments due to safety and liability concerns.
4. The DEIS does not fully address the long-term impact on recreational and economic expansion needs in the future. Hunting and snowmobiling are not the only uses for this land and increasing populations, especially in the southern, more densely populated areas of the state, will add to the pressure for such opportunities.

1

2

3

4

RESPONSES TO COMMENTS

Response to Comment No. 1

This proposal will not expand the lateral boundaries of any of the military operations areas (MOAs) that Volk Field personnel currently schedule and manage. Therefore, this proposal should not adversely affect travel for local business executives. The ANG recommends that interested parties call Volk Field at (608) 427-1201 to resolve current operations problems involving local and military aircraft. Aircraft on a VFR flight plan are authorized to transit MOAs at all times at the pilot's discretion. To help determine if the MOA is scheduled to be used during the desired transit time, pilots can call (800) 972-8673 or listen to an ANG-sponsored airspace information system recording broadcast on frequency 120.0 MHz. The ANG initiated this recording as a service to pilots so they can plan their flights knowing the military's planned activities. The aircraft have unimpeded access to MOAs during periods of non use.

Response to Comment No. 2

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 3

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 4

The recreational and economic expansion needs of the State of Wisconsin are outside the required scope of this EIS.

036LO

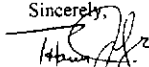
Thomas

Jurder

4. The DEIS states that 40% of Wood County is forested, but it does not break that figure down to state how much is in very small residential plots, nor how much is in timber production.
5. The DEIS does not address the issue of the Range's proximity to dense population centers such as Madison, LaCrosse, Milwaukee, Minneapolis, Wood & Portage Counties (140,000+).
6. The DEIS has insufficiently addressed the alternative options to expansion of the Hardwood Range, namely expansion at another armed services base, at a base due for closure or reductions, or on land currently owned by the Federal government.
7. The DEIS over-states the economic impact of construction contracts and civilian and military employee wages. Since 1993, only 2 contracts, one for \$100,000 and one for \$700,000 have been awarded to Wood County contractors. A 1992 contract for \$7,800,000 was for runway construction and industry estimates assume that 75-80% of the contract was for ready-mix materials. Of the 268 military and civilian employees, only 10 are from Wood County. This information is from the ANG.

The DEIS is inadequate and does not meet the concerns of Wood County or the City of Wisconsin Rapids. This expansion can only have a negative impact on the area's current and future economic needs.

Sincerely,



Thomas Judge, President
River Cities Development Corporation

RESPONSES TO COMMENTS

Response to Comment No. 5

The U.S. Forest Service forest inventory identified 215,400 acres of timberland in Wood County in 1996, of which 55,500 acres were in public ownership, 5,300 acres were owned by the forest industry, 37,600 acres were farmer/rancher owned, 26,700 acres were owned by private corporations, and 90,300 acres were owned by private individuals.

Response to Comment No. 6

The population centers listed in the comment are located outside the region of influence selected as reasonable for the socioeconomic analysis, therefore they were not included in the EIS. Because of these cities distance from the range and dense populations (relative to the ROI), they would not experience any notable impacts as a result of the proposed action or alternatives. For a map indicating the location of large communities in the region surrounding the range, please refer to Figure 2-1.

Response to Comment No. 7

Reasonable alternatives applicable to the Hardwood Range operations were presented in Subsection 2.3 of the EIS.

Response to Comment No. 8

The data provided regarding Wood County military-related contracts and employment has been incorporated.



4021 8TH STREET SOUTH • WISCONSIN RAPIDS, WI 54494 • TEL: 715-423-8700 • FAX: 715-423-0797

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

October 22, 1997

Air National Guard Readiness Center
Program Manager Hardwood Range EIS
ANGRC/CEVP
3500 Fetchet Avenue
Andrews Air Force Base MD 20762-5157

I, the undersigned member of the Wisconsin Rapids Area Chamber of Commerce, would like to voice my opposition to the proposed expansion of the Hardwood Bombing Range into the Wood County Area.

It is evident that there are no benefits for Wood County should the range be expanded as proposed, yet there are serious negative impacts! Wood County and the State of Wisconsin will lose over 6,000 acres of irreplaceable forest land currently being used for recreation, wildlife habitats, wet land preservation and timber production. Furthermore, attempts by Wood County to identify replacement lands have been met with persistent, severe opposition. Each taxpayer in Wood County will sustain severe losses from any action that disintegrates our ability to attract, retain or expand existing business and industry.

The people of Wood County and members of the Wisconsin Rapids Area Chamber of Commerce have aggressively fought to continually improve our area and will continue to do so.

Sincerely,

John R. Knolinski
President

RESPONSES TO COMMENTS

JOHN R. AND PAMELA J. KNOLINSKI

2640 Abby Lane • Wisconsin Rapids WI 54494 • (715) 424-3938 • work (715) 423-8700

October 22, 1997

Air National Guard Readiness Center
Program Manager Hardwood Range EIS
ANGRC/CEVP
3500 Fetchet Avenue
Andrews Air Force Base MD 20762-5157

I, the undersigned private pilot and member of the Wisconsin Rapids Area Chamber of Commerce, would like to voice my opposition to the proposed expansion of the Hardwood Bombing Range into the Wood County Area.

It is evident that there are no benefits for Wood County should the range be expanded as proposed, yet there are serious negative impacts! Wood County and the State of Wisconsin will lose over 6,000 acres of irreplaceable forest land currently being used for recreation, wildlife habitats, wet land preservation and timber production. Furthermore, attempts by Wood County to identify replacement lands have been met with persistent, severe opposition. Each taxpayer in Wood County will sustain severe losses from any action that disintegrates our ability to attract, retain or expand existing business and industry.

The people of Wood County and members of the Wisconsin Rapids Area Chamber of Commerce have aggressively fought to continually improve our area and will continue to do so.

Sincerely,

Pamela J. Knolinski

Pamela J. Knolinski

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Oct 22 97

W. National Guard
Re: Howardwood Range

Dear Sirs:

I live in the township of Hansen in Wood Co. Our home & buildings are on a hill with woods on two sides. I hate to think of what our place would look like if one of those fighter jets would end up like so many have done this last yr. Sometimes 3 or 4 a week have smashed into the ground.

I also know what the sound is like when they pass over after surprising a person.

So practice some where over the water where its flat & try flying 2' over it if you wish. I don't want or need this.

Thomas J. Ruesch & wife Viola
5174 Co. Rd.

Uesper WI 54489

Written Comment Form

OCT 23 1997

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Jim GINTER
TITLE/ORGANIZATION: LANDOWNER
ADDRESS: W 7567 2ND ST Necedah, WI 54646
(Street) (City/State/Zip)

- COMMENTS -

THIS DRAFT EIS IS A TOTAL SHAM. THE REAL
ENVIRONMENTAL ISSUES HAVE NOT BEEN ADDRESSED OR
HAVE BEEN SMOOTHED OVER IN AN EFFORT TO DUPE
THE PUBLIC.

MIGRATORY BIRD ACTIVITY COMPARED WITH A
"CHICKEN STUDY"? I AM ACCUSING YOU OF LAZINESS
AND STUPIDITY.

MITIGATE NOISE POLLUTION AS IT OCCURS? FOR YOUR
INFORMATION, IT HAS BEEN OCCURRING FOR YEARS,
AND YOU ARE NOT TRYING TO MITIGATE IT NOW, SO
HOW CAN YOU MITIGATE IT IN THE FUTURE?

NO INCREASE IN AIRCRAFT SORTIES? THE DOPAA
ITSELF HAS A CHART WHICH CLEARLY STATES
A PROPOSED INCREASE. YOU PEOPLE ARE TRAINED
LIARS, HIDING UNDER THE GUISE OF ENVIRONMENTAL
LAW. THE EIS IS A WASTE OF OUR MONEY!

Please hand this form to the staff, drop into the
collection box, or mail to:

Program Manager, Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fletcher Avenue
Andrews AFB, MD 20762-5157

RESPONSES TO COMMENTS

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

October 23, 1997

Daniel and Donna Goluke
 7095 Lindsey Road
 Marshfield, Wisconsin 54449

Program Manager
 Hardwood EIS, Environmental Division
 Air National Guard Readiness Center / CEVP
 3500 Fitch Avenue
 Andrews AFB, MD 20762-5157

Sir:

I am writing so that this letter will be included in the Hardwood Range Expansion Environmental Impact Statement. My wife and I are real estate owners in the township of Cary in Wood County, Wisconsin. We understand our property as well as the majority of the township has been selected to replace the 6000 plus acres of Wood County forest that would be lost if this project were to proceed. Why were we not informed of these plans when we purchased the necessary permits required to build our home, only to have this expansion project hang over our heads now?

We certainly would not have placed ourselves in this position had we known. Our taxes have increased dramatically. What will happen to the tax base in

RESPONSES TO COMMENTS

Response to Comment No. 1

As of this publication, the Air National Guard has not received any proposals that could be construed as an approach to provide alternate lands that could replace lands lost if the Department of Defense approves the range acquisition, as outlined in Section 1. If the acquisition occurs, it is anticipated that a majority of the forest lands and agricultural uses would remain as they exist today. If the Department of Defense approves the acquisition, depending on how it is accomplished (i.e., fee simple purchase, leasing from owners or the State, license, etc.), replacement lands would be an action that the State of Wisconsin or Wood County could address, as appropriate.

Response to Comment No. 2

The types of taxes that could be affected by the potential purchase of replacement lands have been discussed in Subsection 4.12, however, the specific jurisdictions that would be affected and the amounts are not known. Also, refer to response to Comment No. 1 above.

RESPONSES TO COMMENTS

Wood County, if the Township of Cary becomes public county forest land? The Pitterville school has recently added on with our tax dollars. How will this addition be justified if the people living in the Township of Cary move away? Where will they move?

We enjoy the peace and quiet private land can offer, yet we are confronted annually with the problem of trespassing. The majority done by hunters. It seems every year there is more "public" and less land available to them. What will happen to our private land if the land around us becomes public hunting land? I feel the hunting pressure will only be compounded. Opening the "expansion area" to hunters for the 9 day gun deer season will not suffice. Throughout the entire year, there is the small game season, snowmobiling, hiking, biking, camping, etc. to be addressed also.

We experience "low level" flights most every weekend while we work on our property. How will the hunters react to all of this activity? How do you think the game reacts to this activity? If the hunters' game reacts like our domestic animals, there will be less successful hunters. Jets do make a great deal of noise.

Response to Comment No. 3

If additional instances of trespassing were to occur as a result of county replacement lands surrounding a private owner's property or reductions in recreation access to existing public land, this would be a local law enforcement issue that would need to be brought to the attention of local authorities.

Response to Comment No. 4

No changes in low-level flights are proposed for areas where hunting would be occurring at the same time.

Response to Comment No. 5

The best available information indicates that the effects of aircraft overflights on wildlife and livestock are generally short-term and minor, with no mechanism for long-term effects such as reduced reproduction, increased mortality, or habitat abandonment. Noise impact studies from a variety of military use areas were considered in the impact analysis process. Please refer to Subsection 4.8.1.3 of this EIS for further discussion of noise impacts to wildlife. Noise effects from overflights are addressed in Subsection 4.2 of the EIS.

pollution! What about hiking and biking and fishing? How enjoyable are these activities when you are out in mother nature's forest with low level jet flights buzzing overhead repeatedly?

There is a great deal of wetlands in your proposed areas. Wetlands are very sensitive areas and should be an environmental concern. With the proposed increases in flights, isn't there a greater risk of accidents? June 25, 1995 the news reported a crash of an F-16 in Twpelleau County near Eau Claire on its way to Hardwood Range and Volk Field. As I mentioned earlier, we are located in one of your "air corridors" and experience quite a lot of flights during the week and especially over the weekend. There have been a number of occasions when these jets were so low we could see the pilot in the cockpit. Don't you think we should be concerned about our safety? We do! The town of Cary may not be a thriving metropolis, but there are many people out here. That crash was inevitable and there will be more. Take a look around the nation at all the recent F-16 crashes. Fly over Wisconsin at night and there are lights everywhere! This is a very populated state. Why can't you expand your

RESPONSES TO COMMENTS

Response to Comment No. 6

No changes in low-level flights are proposed in areas where recreational activities would be occurring at the same time.

Response to Comment No. 7

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 8

The use of other training areas was examined as part of the development of the alternatives studies in the EIS and is given in Subsection 2.3.2. The proposal was designed to minimize conflicts with potentially sensitive areas while providing the training resources necessary to meet military readiness requirements. Because of limited fiscal resources and aeronautical constraints, virtually all of our nation's fighter units train in airspace that is within a "tank of gas" of the aircrews' home station.

RESPONSES TO COMMENTS

ranges in the western states where you have less population and people more willing? Aren't there bases the government wants to close, yet the communities are fighting to keep open?

We will close this letter stating our opposition to this expansion. I believe our tax dollars can be spent on much more useful and environmentally safe projects. Furthermore, we are not happy at all about our previous hard work of trying to fight this expansion being outdated now after the draft FIS was printed. We wish to remain informed individuals and will send copies of this letter to our congressmen and representatives.

Thankyou for allowing us to be included in the process of this FIS.

Sincerely,

Daniel J. Golube
Donna M. Golube

Response to Comment No. 9

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Written Comment Form

HARDWOOD RANGE EXPANSION AND RELATED AIRSPACE ACTIONS ENVIRONMENTAL IMPACT STATEMENT

RESPONSES TO COMMENTS

If you would prefer to submit written scoping comments, please use this form to provide comments on the EIS. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Dale or Patricia Gray 10-23-97
2475 Batterman Road
P.O. Box 13
TITLE/ORGANIZATION: Babcock, WI 54412
ADDRESS: _____
(Street) (City/State/Zip)

- COMMENTS -

10-28-97

On written Comment Form sent to you on 9-19-97, I asked if my comments could be included on the final E.I.S. As of this date 10-22-97 I have not received confirmation of such. Would you please give me a written confirmation if any or all my comments will be included in Final E.I.S. If not all please advise me as to which ones will be included. Thank You.

Page 2-33 Relocation of six year-round residences: This needs updating in the final E.I.S. I can see 9 mobile homes (of which 5 are rentals), eleven year-round residents and two homes that are rental. Please include how all this plus rental business is going to be handled in final E.I.S.

Page 3-24 of D.E.I.S. needs plot of updating due to all frequent loss of aircraft and personal property. You stated about the mishaps but do not admit to personal loss, but you do state about a pilot safely ejected. I request you stating in final E.I.S. about the pilot and aircraft lost right on the range and the accident West of the range in National Wildlife Area. Please forward confirmation to me as to how my comments

Response to Comment No. 1

Updated information on the number of year-round and seasonal residences located within the range expansion area has been included based on new real estate data and aerial photos. If Federal purchase of rental property occurred, renters would be offered relocation assistance in accordance with Federal regulations.

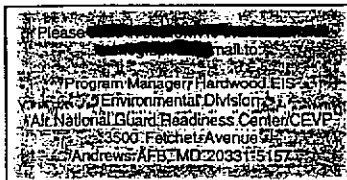
Response to Comment No. 2

As discussed in Subsection 3.3.3.1 of Volume I, during the 42 years of operations at Hardwood Range, four Class A mishaps have occurred on the range. The 1983 mishap involved an A-4 aircraft and resulted in a fatality. In 1995, an F-16 aircraft entering the Falls I MOA well to the west of the range experienced an engine failure, and the pilot successfully ejected.

are going to be handled.

Thank You.

(over please)



04220

Date
Patricia

Gray

pg. 3-77 - Deer Season - range is open for hunters -
Yes, but A.W.G. has air craft flying at 5,000 feet,
can you hear a deer running in the brush with
air craft over head - No you cannot.

3

Page 4-76 - Landowners participating in the Woodland
Tap Low program would pay back taxes. This should
not be the Landowners responsibility as they are being forced
to sell. The Landowner needs to be except from this
responsibility. This should also include Landowners in the
Forest Crop Low contracts.

4

Page 8 - 2.0 Region of Influence -

- ① Loss of school taxes
- ② Flying Air-Craft close to schools, towns, churches, businesses
and larger residential areas.

5

Page 16 - 3.22 Population needs to be address as to
residents at the ~~state~~ ^{start} of Range and the latest population
to show the growth increase in Juneau and Wood County.
Also population increase of the State of Wis. which was
nearly 1.5 million in the last 50 years.

6

Page 29 - 4.1.1. Land Ownership and Land Use needs updating
Page 2-15 2.3.21. Last paragraph Second sentence (Experience has
shown that realistic training for tactical aircraft requires a land area
of least 7 miles by 5 miles for target dispersal.) Please include in
final E.I.S. where the A.W.G. plans their next land grab to accomplish
this sight as with proposed expansion the A.W.G. will still need
~ additional 7000+ acres. ^{plus 7334 acres.} Sincerely Dale R. Kray

7

RESPONSES TO COMMENTS

Response to Comment No. 3

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 4

Property appraisals would consider such factors as land use and entry in forest tax programs in determining the appraised value.

Response to Comment No. 5

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 6

Updated State of Wisconsin population estimates for Wood and Juneau County and the communities in the vicinity of the existing range and the range expansion area have been incorporated.

Response to Comment No. 7

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

RESPONSES TO COMMENTS

830 Avon Street
Wisconsin Rapids, WI 54494
October 23, 1997

Program Manager
Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fetchet Ave.
Andrews AFB, MD 20762-5157

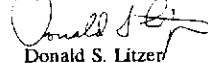
Dear Sirs,

I write today to express my strong opposition to the proposed expansion of the Air National Guard's Hardwood Bombing Range into south Wood County. My position is grounded on three points:

- 1) The military rationale for the expansion is weak. There is little evidence of an increased threat to national security that would warrant an expansion of training facilities. The Hardwood Range's contribution to the Gulf War effort indicates that is already adequate to meet its stated mission.
- 2) It is indisputable that expansion of the range would cause environmental harm, and the military's ignorance of this fact has been nothing short of alarming. Only an imminent external threat to the U. S. would warrant the environmental degradation that would be caused by the proposed expansion.
- 3) It is a fact that the National Guard has not absorbed its fair share of cuts in the post-Cold War military budget world, compared to the regular army. It seems that this expansion is being pursued not for legitimate military purposes, but to make the Hardwood Range more difficult to eliminate in the future. The National Guard, like all other government agencies, should be made aware of its responsibility to do more with less.

I certainly hope that this expansion is examined on its merits and appropriately decided against. Thank you for your consideration.

Sincerely,


Donald S. Litzer

Response to Comment No.1

Training for potential military conflict in time of peace is a reality recognized by the Congress and the President. As military forces are cut back, the quality of training for existing forces must be maintained and improved to ensure our nation has an effective military. As the active duty military force is reduced in size, the ANG role in the total force structure is increasing. Over the past several years, the DOD has conducted studies to evaluate mission readiness and cost effectiveness of its total force. In comparison to DOD regular components, the ANG has relatively low operating costs and provides a cost effective investment.

Response to Comment No.2

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

MEMORANDUM

to: Program Manager, Hardwood EIS, Environmental Division
from: Steven Meis *SM*
subject: Hardwood Bombing Range opposition
date: 10/23/97

I am writing to oppose the expansion of the Hardwood Bombing Range. I have resided in Wood County for 28 years and have not yet or will ever get used to the annoying and disruptive air noise. I have many times contacted Sgt. Leo Clark from Volk Field to inform him of the extreme activity above our home. We live in the low level approach zone to the Hardwood Range and often the F-16's do the fly bys over our house at a dangerous level. Since our house sits in the middle of 700 acres of land, I feel that they use it as a land mark. We have two small children and this kind of invasion has disrupted nap times / bed times and I believe the effects are harmful and damaging.

I also do not feel that Wood County should lose 6000 acres of forest crop land and not have any advantage (monetary or otherwise) to our county. In this time of reduced military spending there must be a better way to increase training without an unnecessary expansion and the extreme negative impact it will have on the people that are directly involved.

Steven Meis
3804 Co. Hwy. 22
P. Hs. v. l. w. WI 54466

RESPONSES TO COMMENTS

October 23, 1997

Darrel and Linda Roder
S3413 Lincoln
Marshfield, WI 54449

Program Manager
Hardwood EIS, Environmental Division
Air National Guard Readiness Center / CEVP
3500 Fetchet Avenue
Andrew AFB, MD 20762-5157

Sir:

We write to inform you of our opposition to the expansion of the Hardwood Bombing Range. We regret it's existence, but to enlarge it is beyond our accepting it without speaking out. We are avid outdoor people and truly enjoy the great outdoors. We fear with the proposed increase in sorties and more high tech machines being flown in, will very much pollute our world with noise and the almost sure bet of a crash. Not so unbelievable, considering all of the recent F-16's going down around the nation. We should be concerned about our safety. Wisconsin is a very populated state. Expand your bases in the western parts of the United States, or better yet, reopen some of the existing bases that have been shut down. It is still costing us dollars to maintain these idle units.

We believe our hard earned tax dollars can be spent on much more useful projects, and we thank you for allowing us to be included in the process of this Environmental Impact Statement.

Sincerely,

Darrel Roder
Linda Roder

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

435

-1

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

October 24, 1997

Sirs;

In regard to the expansion
of the Hardwood Range in Wood County-
We are very much opposed
to the expansion;

We do not need the loss
of more forest land, Cranberry
beds, and wild life.

People should not have
to lose their homes and their
employment.

The County will be losing
out also.

We do not need more flights
flying over and disrupting the community.

We Do Not Want The
Expansion-

Thank You

Dore & Marge Brockman
Pittsville, Wis.

2/24/97

RESPONSES TO COMMENTS

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 2

The use of other training areas was examined as part of the development of the alternatives studies in the EIS and is given in Subsection 2.3.2. The proposal was designed to minimize conflicts with potentially sensitive areas while providing the training resources necessary to meet military readiness requirements. Because of limited fiscal resources and aeronautical constraints, virtually all of our nation's fighter units train in airspace that is within a "tank of gas" of the aircrews' home station.

Re: Hardwood Bombing Range Expansion in WI:

As residents of Wood County, WI, we find ourselves very opposed to the Hardwood Expansion. We have enjoyed using these lands for hunting purposes every year and believe the loss of these public lands for Wisconsin residents is immeasurable. The added noise for Hardwood area residents and wildlife alike would be very disruptive!

The government doesn't seem to know where Wisconsin is located until they want to take our public lands and forests.

There certainly has to be somewhere else in the U.S. where people are not too plentiful like the desert, where a bombing range could be available.

Sincerely,

Willard & Shirley Kussman
1121-18th Street South
WI Rapids, WI 54494

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

10-24-97
TO WHOM IT MAY CONCERN:

We are AGAINST THE
EXPANSION of the present
Hickwood Range in
Central Wisconsin. We
want the guard to be
properly trained but
think you can get land
needed in a less
populated area.

Signed

William J. Schultz
Carol E. Schultz

570 HILLCREST AVE.
NEKOOSA, WI
54457

W Sell
2827 S. Lenox
Milwaukee, WI 53207
414 744 3970

RESPONSES TO COMMENTS

October 24, 1997

Col. Kent Adams
Program Manager Hardwood EIS
Air National Guard CEVP
3500 Fetchet Ave.
Andrews AFB, MD 20762-5157

Dear Colonel Adams:

Who is enforcing the law?

I am disheartened to learn that the military is going to take possession of public forests in Wood County, in spite of the fact that the people of Wisconsin and Wood County officials have stood firm in their opposition to this steal. It is amazing to think that in this day of environmental sensitivity a public forest and the pleasure of its owners, the citizens of Wisconsin, can so totally disregarded.

If it were a matter of national security, most Americans would understand the need for some kind of accommodation. But our nation is at peace. There are plenty of bombing ranges already in Wisconsin and in other parts of the country — already devastated by sorties. Why in the name of peace is it necessary to sacrifice 6000 acres of our woods now?

The Draft Environmental Impact Statement (which I read) is a mockery of good sense. How can regular sorties and live explosions in a forest be said to have "no significant impact"? Do they plan to miss the target? To leave dummy bombs lying around for no one to clean up? What exactly does the Guard have in mind for "no significant impact" on this land? Picnics with families? One need only look at the devastation of the environment in other parts of Wisconsin where bombings have been conducted to learn what will happen to this precious forest and the rivers that run through it.

Please, intervene to prevent this unnecessary damage to our most precious resource. State Statute 28.11 is operative here and forbids exactly what is about to happen. If we have a law, may I ask, who in government is responsible to enforce it? Would you please check into this matter and let me know?

Sincerely,



William Sell

from the desk of William Sell

Response to Comment No. 1

Training for potential military conflict in time of peace is a reality recognized by the Congress and the President. As military forces are cut back, the quality of training for existing forces must be maintained and improved to ensure our nation has an effective military. As the active duty military force is reduced in size, the ANG role in the total force structure is increasing.

Response to Comment No. 2

As noted in Subsection 3.3.4.1 of the EIS, only training or inert ordnance is used on the range. No "live" (high explosive) bombs or high explosive/incendiary gun ammunition is permitted. Furthermore, as discussed in Subsection 3.3.4.1 and further explained in Subsection 4.3.2 of Volume I of the EIS, before any ordnance of any type is approved for use on a target on the range, the safety footprint associated with the aircraft, the ordnance, and the delivery tactic is analyzed in conjunction with range geography. These footprints encompass sufficient area to contain 99.99 percent of the delivered ordnance at a 95 percent confidence level. If necessary, constraints may be placed on delivery profiles to further ensure that the footprint remains within range boundaries.

Expended ordnance is removed from the range at regular intervals. During collection, training ordnance is inspected to determine if a spotting charge may have malfunctioned and failed to detonate. If suspect, explosive ordnance disposal specialists render the ordnance safe using a small explosive charge. All metal casings are collected and recycled to scrap metal.

Response to Comment No. 3

Section 28.11(1) of the Wisconsin Statutes does not specifically state that military use of county forestlands is authorized or prohibited. In the past, the Wisconsin Attorney General's Office has stated that lack of specific statements giving authorization is a shortfall. One Attorney General stated this could be remedied by "either legislative amendments or the expansion of existing military establishments." Clearly, the pursuit of the expansion is what is now being addressed. However, this prohibition against use does not stop the withdrawal of the lands from the County Forest Law Program and sale of the lands for range expansion. That decision will be based on the results of the environmental studies. If a decision is made to expand the range, the county and the Wisconsin's Department of Natural Resources will be involved in the withdrawal process.

10/24/97

Dear Col. Adams,

Thank you for sending the environmental impact study on the proposed expansion of bombing range in forested lands of Wood County.

I wish to express my solidarity with the many people before me who feel that forest land, a disappearing national treasure, is more important to the Commonwealth than a constantly proliferating military destruction.

If you are indeed our public servant, please protect our earth; it's the only one we've got, you and I.

Sincerely,

Keith Wright
102 E. Gorham St
Madison WI 53703

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

RESPONSES TO COMMENTS

Program Manager, Belwood EIS.
Environmental Division
Air National Guard Pensacola Center, CEVP
3500 Fletcher Avenue
Andrews AFB, MD 20762-5151
12-25-97.

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Sirs -

I oppose the Hardwood range
expansion into Wood County, Wis-
consin because it is located
in our recreational area and
detrimental to our environ-
ment in this populated area
causing pollution and noise.

Please find a different
area located at one of the
abandoned army bases around
the country.

Thank you for reading this.

Mrs. Ruth Arendt
Taxpayer in Wood County, WI.
4395 Lynn Hill Rd.
Wausau, WI 54457-9688.

RESPONSES TO COMMENTS

10/25

Dear Program Manager:

This is to lodge my complete and total opposition to any expansion of the Hardwood Landing Range. -

This is NOT an unpopulated area! -

The safety record of the AF is dismal!!

The FIS stinks - It is so ambiguous -!

An active pilot - small farm - we live just outside the Volk MPA - last year 2 F-16's

"pounded" a C-130 in what would be the approach path to RWY 34 @ MFI - I was on a tractor & clearly saw & heard them - above the tractor's rear & wearing hearing protection -

a complaint was lodged with Drum Bay FSS -

- received a reply from Capt Z from Madison

WI was promised a written explanation -

NO JOY! - ~ 8 weeks ago - a B-52H

went over our farm - ~ 300' AGL - ~ 450k

- the AC had lots of whitewater. A complaint

was lodged w/ the Milwaukee FSDO - I was

promised a reply from the Mil ND FSDO!

NO JOY!

(ann)

Response to Comment No. 1

The ANG takes the public's concerns about pilot accountability very seriously. Any misconduct by a military pilot is a serious matter. If a member of the public is experiencing any problems with the military's operations in any of the airspace in the area that affects a person directly, the public affairs officer at the nearest military installation should be contacted immediately, or call (608) 245-4339.

The Federal Aviation Administration and each military service have very strict rules to ensure pilots stay within defined training airspace. The rules govern minimum altitudes, maximum speed, and type maneuvers that can be performed inside and outside designated training airspace. Military commanders have the authority to suspend pilots who willfully violate flight rules, such as flying outside designated training airspace. The military closely manages the airspace they use to ensure they do not exceed planned parameters.

RESPONSES TO COMMENTS

If I - as a civilian pilot - bustled up
like this - I would be a pedestrian.

Sir/Mam - Rest assured we will
fight this to the end.

As I fly across the USA - I see
vast areas of MOA - we do not need/want
any expansion here - our dairy farming
neighbors are sick & tired of low level
flights. - I have to call MPLS Center to
determine if its safe to fly in Volk MOA.

As outdoor enthusiasts - we already have
the tranquility degraded while hunting & fishing or
just canoeing or walking. -

Again - WE ARE OPPOSED

Howard Rand

LOPA 1195045 4

EAA 107935

Response to Comment No. 2

This proposal will not expand the lateral boundaries of any of the military operations areas (MOAs) that Volk Field personnel currently schedule and manage. Therefore, this proposal should not adversely affect travel for local business executives. The ANG recommends that interested parties call Volk Field at (608) 427-1201 to resolve current operations problems involving local and military aircraft. Aircraft on a VFR flight plan are authorized to transit MOAs at all times at the pilot's discretion. To help determine if the MOA is scheduled to be used during the desired transit time, pilots can call (800) 972-8673 or listen to an ANG-sponsored airspace information system recording broadcast on frequency 120.0 MHz. The ANG initiated this recording as a service to pilots so they can plan their flights knowing the military's planned activities. The aircraft have unimpeded access to MOAs during periods of non use.

RESPONSES TO COMMENTS

25 October 1997

Dear Program Manager,

As a citizen of Wood County and an Air Force veteran, I am concerned about the unrealistic attacks against the Wisconsin Air National Guard and the need for expansion of the Hardwood Range. Your support is needed for the following reasons:

- 1-The Hardwood Range needs to be upgraded for the next generation fighter plane, the F-22.
- 2-These part-time military pilots need to train in their home state for they have civilian jobs and families to support.
- 3-The Guard Fighter Groups are involved in more world-wide military operations because the active Air Force has been reduced in size by budget cuts.
- 4-If Wisconsin Guard pilots are to continue to perform expertly, they need the best training opportunities America can provide for them. They need to be combat ready at all times.
- 5-Last year our P.O.W. group was honored at Shepard Air Force Base in Wichita, Texas. This is the main training facility for Air Force fighter pilots and for nine N.A.T.O. nations. The commanding general briefed us on modern flight training which costs one million dollars per year for each student pilot. This investment in military preparedness could be lost if we should fail to provide adequate training facilities.
- 6-The United States is the only remaining Superpower and Uncle Sam needs to carry the "Big Stick" which is Air Power. The Wisconsin Air National Guard is now and should continue to be an important part of our Air Force.

I urge you to support the Hardwood Range expansion project.

Sincerely,

John E. Thompson
John E. Thompson M.D.
705 West 5th St.
Nekoosa, Wi. 54457

Captain U.S.A.A.F.
86th Fighter Group W.W.2
P.O.W. 1944.

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

5300 Hwy .54 West
Wisconsin Rapids WI
54495

October 26, 1997

PROGRAM MANAGER HARDWOOD EIS
ENVIRONMENTAL DIVISION
AIR NATIONAL GUARD READINESS CENTER / CEUP
3500 FETCHET AVE.
ANDREWS AFB. MO
20762-5157

Dear Sirs,

Am writing to protest the proposed expansion of the hardwood bombing range into Wood County, I live just to the north of the area and the quality of life is bad enough now with the number of jets we have and some even breaking the sound barrier. If this area got as noisy as it is now around the present range I would move and if the proposed expansion goes through I am sure property values will fall. Have lived here and hunted in the proposed expansion area for thirty five years so know the area well, there are many marsh areas with its related wild life which I am sure would be harmed. we also have two families of trumpeter swans in the area that have reproduced for the first time this year.

Sincerely,

Len Purvis

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Written Comment Form

OCT 27 1997

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: FRANCIS "Bud" DALY

TITLE/ORGANIZATION: WWII ~~VEERAN~~ VETERAN

ADDRESS: 1840 2ND AVE SOUTH WISCONSIN RAPIDS, WI 54495
(Street) (City/State/Zip)

- COMMENTS -

I Am 100% in favor of the expansion of the Hardwood Range. I believe in a strong military with state of the art training facilities. Not to support our military because of marginal forest land and making Cranberries an issue is wrong. The country involved would be compensated and so would the Cranberry growers.

I thought the "Doves" had gone back to their nests. Don't people remember the Cold War was won by firm resolve and a strong military? Are we going to go back to old fashioned regressive thinking? I hope not!

Francis "Bud" Daly

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

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Please hand this form to the staff, drop into the collection box, or mail to:

Program Manager, Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fetcher Avenue
Andrews AFB, MD 20762-5157

05510

Francis

Daly

MARSHFIELD CLINIC

ROBERT I. DE VRIES
EXECUTIVE DIRECTOR

**Harry A. Kaudsen, Jr., Chief
Planning Branch
Air National Guard Environmental Division
ANG/CEVP
3500 Fetchet Avenue
Andrews AFB, MD 20762-5157**

Dear Mr. Knudsen:

Both as a member of the Marshfield Area Chamber of Commerce & Industry (MACCI) Board of Directors and a representative of Marshfield Clinic, I wish to officially go on record opposing the expansion of the Hardwood Air-to-Surface Gunnery Range and Associated Airspace Actions. As a member of the medical community, this expansion would affect the safety of the crew and passengers of the Spirit of Marshfield medical emergency helicopter based at Marshfield St. Joseph's Hospital. This service is a regional medical emergency air transport system which has a very successful safety record. We wish to minimize danger to our patients, the medical personnel and flight crew created by expansion. In addition, Marshfield Clinic serves many Wisconsin rural communities by transporting medical specialists to them from the Marshfield airport. The expansion would negatively affect flights at the Marshfield airport.

We do recognize the importance of military readiness, and the need to acknowledge our national defense needs. At the same time, we are requesting an evaluation of the other seven options outlined in the Environmental Impact Statement.

I will not go into a detailed discussion of other concerns expressed by the MACCI Board. Those concerns have been expressed to you in a separate mailing from Ms. Barb Fleisner, MACCI's Executive Director.

Please feel free to call on me if you have further questions about our concerns.

Sincerely,

Robert J. De Vita
ROBERT J. DE VITA
Executive Director

RDV:mb

The proposed range expansion is not anticipated to have an adverse impact on "Spirit of Marshfield" helicopter medevac operations. The Marshfield Base Manager has an agreement with Volk Field personnel which includes procedures to ensure that military flight operations will be curtailed, if necessary, to ensure that "Spirit of Marshfield" flights with patients will have direct, unimpeded access to their destination. In addition, Minneapolis Air Route Traffic Control Center personnel assign the necessary priority to "Spirit of Marshfield" flights to ensure direct light routing. The Marshfield Base Manager has also established an excellent working relationship with Volk Field personnel to ensure that problems are resolved as they are identified.

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

RESPONSES TO COMMENTS

11007 McArthur Dr.
Marshfield, WI 54449
10/27/97

Dear Program Manager Hedwood Ets,
As a Concerned Citizen of Wood Co
State of WI I am Writing to say
I'm Very Much Against the expansion of
the Hedwood Range. I live Northwest
of Marshfield and already experience
the violation of the MORA area. I
see the disruption there fast how
flying planes & jets cause on our
daily industry to say nothing about
the wild life and the peace and quiet
I want living in the country.

We own a small airplane and
we'd never have a chance against
these fast planes.

As a Medical person I'm concerned
about proper Medical Air Lift procedures
being totally unsafe if this is

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 2

The proposed range expansion is not anticipated to have an adverse impact on "Spirit of Marshfield" helicopter medevac operations. The Marshfield Base Manager has an agreement with Volk Field personnel which includes procedures to ensure that military flight operations will be curtailed, if necessary, to ensure that "Spirit of Marshfield" flights with patients will have direct, unimpeded access to their destination. In addition, Minneapolis Air Route Traffic Control Center personnel assign the necessary priority to "Spirit of Marshfield" flights to ensure direct light routing. The Marshfield Base Manager has also established an excellent working relationship with Volk Field personnel to ensure that problems are resolved as they are identified.

expanded. I already feel the
plots are @ risk.

Please do not expand this
range in such an inhabited
area.

Sincerely,
Carol Rand RN

CAROL RAND RN
11007 McArthur Dr.
Marshfield, WI 54449

Oct. 28, 1997

Program Manager -

My friends and relatives have been hunting & fishing the area that the military wants to expand into for many years. We are very much against it.

There are hundreds of square miles of worthless land out west with nothing but sand and prairie. Why ruin this valuable land here.

We & my boys have been hunting and fishing the area since 1957, and that's the truth.

Thank You,
Philip Haast
1710 - 24th Ave So,
Wisc. Rapids WI 54495

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Written Comment Form

OCT 28 1997

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Harvey Kandler

TITLE/ORGANIZATION: Pastor Emmanuel United Church of Christ

ADDRESS: 1312 Sullivan Ave. Kaukauna Wis. 54130

Please send me a final draft of the ^(City/State/Zip) EIS. This is an ^(Street) Official Request

- COMMENTS -

There is no necessity to expand or continue this kind of bombing action by our Airforce & Navy for Army. We have enough sophisticated weapons that should no longer need this kind of practice. The way we fight in the future I'm sure will not use such an outmoded method.

Secondly, if those kind of experiments are still deemed necessary - they should be done in desert areas & totally apart from vegetation and population - destroying the environment of such a lush area as the woods of northern Wisconsin is way off base from any reasonable purpose.

It would seem that the accomplished. It should be weighed against the destruction & I would say still that it is distasteful, destructive and against all principles of merit.

Please hand this form to the staff, drop into the collection box, or mail to:
Program Manager, Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fletcher Avenue
Andrews AFB, MD 20762-6157

RESPONSES TO COMMENTS

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 2

The use of other training areas was examined as part of the development of the alternatives studies in the EIS and is given in Subsection 2.3.2. The proposal was designed to minimize conflicts with potentially sensitive areas while providing the training resources necessary to meet military readiness requirements. Because of limited fiscal resources and aeronautical constraints, virtually all of our nation's fighter units train in airspace that is within a "tank of gas" of the aircrews' home station.

Written Comment Form

OCT 28 1997

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

RESPONSES TO COMMENTS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Vern W. Nelson

TITLE/ORGANIZATION: _____

ADDRESS 430 Buehler Ave. Nehalem Wi. 54457
(Street) (City/State/Zip)

- COMMENTS -

We don't need a Bombing Range Expansion in Wood County. Wood County has nothing to gain by this. Wood County will be the loser, in property taxes, road taxes, and also forest revenue. They will pass it to the paper companies.

I can use this 6,162 acres of land anytime I want for recreational use. If it's turned in to a bombing range, it will be opened the nine days of deer season. Then before to long there will be barracks build and the whole area will be fenced in and then it will be closed to all use other than military.

There is plenty of government land in other places use what they all ready have, and not waste taxpayer money to purchase our county forest.

Please leave Wood County alone and keep your range in Johnson County.

Thank you.

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

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Please hand this form to the staff, drop into the collection box, or mail to:

Program Manager, Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fletcher Avenue
Andrews AFB, MD 20762-5157

06010

Vern

Nelson

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Lee Breeze
215 1st Street
Nekoosa, WI 54457

October 29, 1997

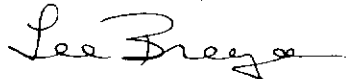
Program Manager,
Hardwood EIS,
Environmental Division,
Air National Guard
Rediness Center/CEVP,
3500 Fetchet Ave.,
Andrews AFB, MD 20762-5157

Dear Program Manager:

As a resident of the City of Nekoosa, I am terribly opposed to any bombing range expansion into our Wood County Forests. I have been to many public meetings regarding this expansion. The majority of residents attending these meetings also oppose the expansion.

The DEIS does not come close in assessing the negative impact the range expansion would have on our area. The effect the expansion of the bombing range would have on our environment in this area would be devastating. The majority of Central Wisconsin residents can see this. Why can't you?

Sincerely,



cc: Senator Herb Kohl
Senator Russ Feingold
Congressman David Obey
Governor Tommy Thompson
State Senator Kevin Shibilski
State Representative Marling Schneider
Wood County Board Chairman G. E. Stargardt
Mayor of Nekoosa Albert Jensen

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1

OCT 29 1997

To the Secretary of the Air Force,

I'm writing in concern of
the expansion of the Hardwood Range.

Our house is located about
15 miles east of the range, we do
get our share of fly over.

Why can't Camp McCoy be
utilized? I would think there could
be a path between Camp McCoy
and the existing range.

I don't believe you should
disturb all the land, people and
animals in the area you proposing.

I hope my concern and
everybody else that writes will be taken
into consideration.

T. Break you
Karen Skerwen
7530 Hazel St.
W. Rapids, WI
54494

RESPONSES TO COMMENTS

Response to Comment No. 1

Discussion of the use of Fort McCoy can be found in Subsection 2.3.2.1 of the EIS.

Response to Comment No. 2

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

10-30-97

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Dear Lt. Col. Kent Adams,

I continue to express my appaition
to the expansion of the hardwood
bombing range in Wood County, Wisconsin.
The loss of over 7,000 acres of both
public and private land is irreplaceable.
The noise and bombing debris would
be harmful to the environment.

The environmental impact statement is
already outdated. A lot of the information
in the EIS is dated to 1991.

One cranberry growing family would
have to give up their way of
life as well as the other residents
that live within the proposed expansion
site.

I think that the range should be
relocated to a different site. Money
is no problem for the Federal
government using American tax dollars.

Sincerely,

Ldney Brockman

October 31, 1997

Hardwood issue

I feel that the advantage
of better training for the
National Guard, and the
effect on our National
Defense and security would
out weigh all the negatives

Donald M Rundacker
3321 3rd St S.
Wisc Rapids wi 54474

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Nov 1, 1997

Dear Sir:

I am opposed to the
proposed expansion of the
Hardwood Bombing Range

1. Harvesting timber
2. Wild life
3. Encroachment for other airports
4. Noise in a now peaceful area
5. A waste of taxpayers money

I hope the military will
consider these things and
and if they would like to
live here under these conditions.

Sincerely
Victor J. Reigel

3787 Hamlock Trail
Wis. Rapids, WI 54495
Nov. 2, 1997

RESPONSES TO COMMENTS

Program Manager, Hardswood EIS
Environmental Division
Air National Guard C E V P
3500 Tatchet Avenue
Andrews AFB, MD 20762-5157

Dear Sirs,

I am writing again expressing my opposition to the proposed expansion of the Hardswood Range.

I agree we need well trained pilots but I think they should train in an area that is not so populated. Rural Wood County is very populated and a lot of low level flying would be done over these areas.

I don't feel the draft of the EIS gives a realistic view of the impact it would have on the area.

I would hate to see the County lands converted into a bombing range as these lands are irreplaceable.

Congress has given the ANG everything they have requested financially and they should look for a larger less populated area to train in.

Sincerely, Yours
Marie Buckman

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

3787 Glenlock Trail
Wisconsin Rapids, WI 54495
November 2, 1997

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No.2

The EIS addresses potential land owner concerns including noise (Subsection 4.2), safety (Subsection 4.3), land use (Subsection 4.10) and visual resources (Subsection 4.11) associated with the range expansion area.

Program Manager, Hardwood EIS
Environmental Division
Air National Guard CERP
3500 Fitchet Ave.
Andrews AFB, MD 20762-5157


Dear Program Manager,

I'm writing to voice my disapproval of the expansion of the Hardwood Bombing Range into Wood County for the same reasons that the County opposes it.

I'm also concerned about how the expansion would impact the existing land owners that would be neighbors to the range.

Sincerely yours,
Yvonne J. Brockman

CC:
Senator Herb Kohl
Russ Feingold
U.S. Rep. David Obey
U.S. Rep. Thomas Petri
Wisconsin State Cranberry Growers Assn.


Rea Kirl
890 Sunbridge Rd. #A22
Placerville, WI 53818

Nov. 2, 1997

The Wood County Forest Land
should not be used for
bombing. I rather
have trees than bombs.
Besides, State Statute 28.11
prohibits county forest land
from being used as a bombing
range. Please don't
waste my money.

Please respond.

Rea Kirl

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

RESPONSES TO COMMENTS

November 2, 1997

Air National Guard Readiness Center
Program Manager, Hardwood Range EIS
ANGRC/CEVP
3500 Fetchet Avenue
Andrews Air Force Base, MD 20762-5157

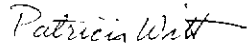
Re: Wood County, Wisconsin

Dear Program Manager:

I am writing to oppose the sale of part of Wood County, Wisconsin, to the Air National Guard as a bombing range. I hate to see more of our state be taken away from its natural beauty and recreational use, and instead filled with airplane traffic and the trash of detonated and undetonated bombs. There is so much pressure on our forests and wild lands from commercial and housing development. I believe that in the future we will find our protected forest lands much more valuable than any other use we can imagine today.

I have a copy of the Environmental Impact Statement dated August 1997. Page xiii lists a number of "other alternatives not carried forward for detailed study", including flight simulators, electronic scoring, sharing the range at Fort McCoy with the US Army. I am sure that the Air National Guard can find a way to practice bombing to sufficiently defend the state of Wisconsin. But we will not be able to easily replace our hardwood forests.

Sincerely,



Patricia Witt
1420 N. Marshall St. #200
Milwaukee WI 53202-2761

Cc: Senator Herb Kohl, Senator Russ Feingold, Attorney General James Doyle

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

1

Paul Field

673 Ten Mile Avenue West - Nekoosa, Wisconsin 54457-8841



November 4, 1997 (4:37pm)

Program Manager
Hardwood Environmental Impact Statement
Environmental Division
Air Force Nat. Guard Readiness Center-CEVP
3500 Fetchet Avenue
Andrews Air Force Base, Maryland 20762-5157

Dear Sir:

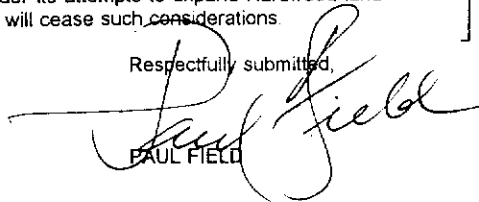
I wish to express my grave concern about the proposed loss of 17 per cent of Wood County's forest for the purpose of expansion of the Hardwood Bombing Range. During each change of the season, I take Batterman Road, an East-West "township" road, to visit a friend in the Town of Remington. His 80 acres is located in the proposed expansion.

I travel down this sandy road, looking into the small streams that cross under it for an occasional duck, partridge, and other wildlife that inhabit the area. There is very limited residential development; so it gives one the feeling of being "out in the wild."

This feeling, these aesthetics, would be lost with the proposed expansion. There would be no more hunting on these public lands. Snowmobiling and nature drives would be curtailed. Noise pollution would be increased.

This land, these feelings for the wild, would be lost forever to generations not yet born. I urge the Air Force to reconsider its attempts to expand Hardwood land acquisition and pray that the Air Force will cease such considerations.

Respectfully submitted,


PAUL FIELD

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Georgette Frazer, CPA, CFP

FINANCIAL PLANNING - INVESTMENTS - INSURANCE

105 West 5th Street
Marshfield, WI 54449
(715) 387-6933

November 4, 1997

Program Manager, Hardwood EIS
Environmental Division
Air National Guard CEVP
3500 Fetchet Avenue
Andrews AFB, MD 20762-5157

Dear Sir or Madam:

I am writing in opposition to the expansion of the
Hardwood Air-to-Surface Gunnery Range proposed for our
area.

My concern is not only for the environmental effect,
but for the negative impact on the local economy
as well. Air commerce from and to our Marshfield
Municipal Airport will be negatively affected, and
there are serious concerns for flight safety of our
Spirit of Marshfield medical helicopter flights.

Please discontinue your effort to expand the range.

Sincerely,

Georgette Frazer

RESPONSES TO COMMENTS

Response to Comment No. 1

Impacts on the local economy have been discussed in the Socioeconomics Subsection 4.12. Access into and through the restricted airspace associated with the expanded range would be granted by the designated Air Route Traffic Control Center (Minneapolis Center), as is the case with the existing range. Although changes in flight patterns could occur, the airspace analysis (see Subsection 4.1.2.2) has not identified any significant impacts associated with proposed changes in the restricted airspace and no significant economic effects are expected. The extent to which the expansion might limit future economic growth located outside of the range is speculative given the numerous factors that affect business and economic decisions.

Response to Comment No. 2

The proposed range expansion is not anticipated to have an adverse impact on "Spirit of Marshfield" helicopter medevac operations. The Marshfield Base Manager has an agreement with Volk Field personnel which includes procedures to ensure that military flight operations will be curtailed, if necessary, to ensure that "Spirit of Marshfield" flights with patients will have direct, unimpeded access to their destination. In addition, Minneapolis Air Route Traffic Control Center personnel assign the necessary priority to "Spirit of Marshfield" flights to ensure direct light routing. The Marshfield Base Manager has also established an excellent working relationship with Volk Field personnel to ensure that problems are resolved as they are identified.

11-4-97

TO: PROGRAM MANAGER, HARDWOOD EIS

I AM OPPOSED TO ANY EXPANSION OF THE
HARDWOOD BOMBING RANGE.

I STRONGLY DISAGREE WITH THE DRAFT
ENVIRONMENTAL IMPACT STATEMENT. IT IS
VAGUE AND CONTRADICTIVE. THE COMPUTER NOISE
AVERAGING IS A JOKE. IN REALITY WE HEAR NOISE
LEVELS WHEN AIRCRAFT ARE FLYING, WHICH IS VERY
LOUD (UNBEARABLE). WHEN THE AIRCRAFT ARE NOT
FLYING WE DON'T HEAR THEM. WE NEVER HEAR A
COMPUTER NOISE AVERAGE.

THE DRAFT EIS STATES THE EXPANSION WILL
HAVE NO EFFECT ON WILDLIFE. I STRONGLY DISAGREE
I HAVE WITNESSED WILDLIFE AND MY HUNTING DOGS
RUN AND HIDE WHEN AIRCRAFT FLY OVER MY PROPERTY
WHICH IS ONE QUARTER OF A MILE TO THE WEST OF THE
EXISTING HARDWOOD BOMBING RANGE.

THE DRAFT EIS STATES THAT THERE WON'T BE
ANY NEGATIVE SOCIAL IMPACT ON HUMAN BEINGS. I STRONGLY
DISAGREE. ENTIRE FAMILIES WILL BE DISPLACED IF
THE HARDWOOD RANGE IS EXPANDED. IT IS ALSO
IMPOSSIBLE TO HAVE A NORMAL CONVERSATION WITH
ANOTHER HUMAN BEING WITHIN THREE MILES OF
THE RANGE WHEN AIRCRAFT ARE USING IT.

RESPONSES TO COMMENTS

Response to Comment No. 1

The approach used to provide noise analyses in the EIS has been specifically tailored to analyses of military aircraft operations. The Federal Interagency Committee on Noise (FICON), representing a variety of Federal agencies with a mix of concerns associated with aircraft noise, reviewed aircraft noise analyses issues in 1992. The committee's report (FICON 1992) continued an approach to evaluating relative impacts associated with aircraft noise that has been recognized by noise analysis experts as the most widely endorsed and comprehensive approach to aircraft noise analysis available. This approach to noise analysis was incorporated into the analyses associated with the Draft EIS. In general, Federal land use compatibility criteria are derivatives of guidelines first devised for land near airports. All land use compatibility is based on the use of Day-Night Average Sound Level (abbreviated as DNL or Ldn) as the descriptor representing community noise environments. The criteria treat areas below DNL 65 dB as compatible for all uses, including residential, and they treat DNL 65 dB as a threshold for significant exposure. There is no generally accepted method for treating rural areas differently for these purposes.

However, many persons, including some members of the Federal regulatory community, feel that to assess rural areas with more quiet ambient noise conditions, the application of FICON standards only, and the 65 dB threshold, is inadequate. Consequently, the use of the 65 dB threshold is presented in combination with Sound Exposure Level (SEL) information to provide the necessary additional information to evaluate potential impacts.

RESPONSES TO COMMENTS

Response to Comment No. 2

Studies conducted on wildlife have shown that numerous wildlife species have the ability to adapt to the presence of man and various man-made sound sources, including jet aircraft noise. While the noise generated from low-altitude military overflights may be initially startling, habituation to jet aircraft noise occurs with most wildlife species. Species-specific responses to low-altitude overflights vary considerably, and responses from individual animals may have the potential to cause injury. However, wildlife populations are usually affected only when a variety of factors work in combination to impact them, including declines or fluctuations in the availability of a food source, habitat destruction or alteration, predation, hunting, trapping, poaching, disease, or inclement weather, rather than noise alone. Normally it would be unrealistic to predict or attribute any wildlife population declines to a single stressor, such as noise. In addition, no published scientific evidence was identified that indicated harm may occur to wildlife as a result of exposure to the levels of noise generated by military aircraft that would utilize the airspace associated with the Hardwood Range.

Response to Comment No. 3

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

11-4-97

RESPONSES TO COMMENTS

I HAVE A WIFE AND TWO DAUGHTERS,
MY DAUGHTERS ARE SO TERRIBLY FRIGHTENED
BY THE AIRCRAFT NOISE FROM THE HARDWOOD
RANGE THAT THEY CRY. THIS IN MY MIND IS ABOUT
AS NEGATIVE AS IT COULD BE.

I AM OPPOSED TO THE AIR NATIONAL GUARD,
OR THE AIR FORCE TAKING POSSESSION OR
CONTROL OF ANY COUNTY FOREST LAND FOR
THE PURPOSE OF BOMBING IT OR USING IT
AS A BUNKER ZONE.

COUNTY FOREST LAND BELONGS TO WE THE
TAXPAYERS. PERHAPS THE MILITARY IS FORGETTING
WHO PAYS THEIR WAY, IT IS WE THE TAXPAYERS
WHO OPPOSE THE HARDWOOD RANGE AND ANY
EXPANSION OF IT!

SINCERELY,
David J. Günter

DAVID J. GÜNTER
3909 SEARLES RD.
WT. RAPIDS, WI. 54495

Response to Comment No. 4

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).



METCALF HAEFNER ARCHITECTS

NOVEMBER 4, 1997

Air National Guard Readiness Center
Program Manager, Hardwood Range EIS
ANGRC/CEVP
3500 Fetchet Avenue
Andrews Air Force Base, MD 20762-5157

The Board of Directors of the Wisconsin Rapids Area Chamber of Commerce, voted unanimously to go on record in opposition of the proposed expansion of the Hardwood Bombing Range.

I, the undersigned Wisconsin Rapids Area Chamber of Commerce member, would like to voice my opposition to the proposed expansion of the Hardwood Bombing Range into the Wood County area.

It is evident that there are no benefits for Wood County should the range be expanded as proposed, yet there are serious negative impacts. Wood County and the State of Wisconsin will lose over 6,000 acres of irreplaceable forestland currently being used for recreation, wildlife habitats, wetland preservation and timber production. Furthermore, attempts by Wood County to identify replacement lands have been met with persistent, severe opposition. Each taxpayer in Wood County will sustain severe losses from any action that disintegrates our ability to attract, retain, or expand existing business and industry.

The people of Wood County and members of the Wisconsin Rapids Area Chamber of Commerce have aggressively fought to continually improve our area and will continue to do so.

John Haeffner

*John Haeffner
President, Wisconsin Rapids Area Chamber of Commerce*

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RESPONSES TO COMMENTS

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 2

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

467

10-4-97

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Air National Guard Readiness Center
Program Manager, Hardwood Range EIS
ANGRC/CEVP
3500 Fetchet Avenue
Andrews Air Force Base, MD 20762-5157

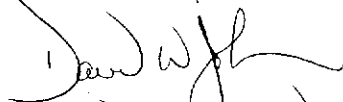
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The people of Wood County and members of the Wisconsin Rapids Area Chamber of Commerce have aggressively fought to continually improve our area and will continue to do so.

Sincerely,



David W. Johnson

1410 23rd St N
Wisconsin Rapids WI 54494

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Dawut

Johnson

NOV 4 1997

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Air National Guard Readiness Center
Program Manager, Hardwood Range EIS
ANGRC/CEVP
3500 Fetchet Avenue
Andrews Air Force Base, MD 20762-5157

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The people of Wood County and members of the Wisconsin Rapids Area Chamber of Commerce have aggressively fought to continually improve our area and will continue to do so.


President

HOME FURNITURE
1840 W. Grand Ave.
Wisconsin Rapids, WI 54495

November 4, 1997

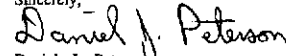
RESPONSES TO COMMENTS

Program Manager
Hardwood EIS Environmental Division
Air National Guard

Dear Sir:

The purpose of this letter is to urge to reconsider the expansion of the Hardwood Bombing Range in Wood County Wisconsin. As a regular user of the land in the proposed expansion area, I stand to lose a significant source of recreation as does my family. While my reasons for opposing this expansion appear selfish, they are shared by virtually all private landowners involved as well as the county board. With such unanimous opposition from the environmentalists, Indian tribes, recreational users and the surrounding communities, would it not be smarter to expand the training opportunities in areas where the federal government owns the land and is welcomed by its neighbors?

Sincerely,


Daniel J. Peterson

cc Sen. Russ Feingold WI
Sen. Herb Kohl WI

Response to Comment No. 1

The use of other training areas was examined as part of the development of the alternatives studies in the EIS and is given in Subsection 2.3.2. The proposal was designed to minimize conflicts with potentially sensitive areas while providing the training resources necessary to meet military readiness requirements. Because of limited fiscal resources and aeronautical constraints, virtually all of our nation's fighter units train in airspace that is within a "tank of gas" of the aircrews' home station.

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076LO

Daniel

Peterson



Kenneth E. Schwab, LUTCF
Career Agent

Sales Office:
2141 8th St. S.
Wisconsin Rapids, WI 54494
(715) 421-1111
FAX: (715) 421-1121

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

November 4, 1997

Air National Guard Readiness Center
Program Manager, Hardwood Range EIS
ANGRC/CEVP
3500 Fetchet Avenue
Andrews Air Force Base, MD 20762-5157

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The people of Wood County and members of the Wisconsin Rapids Area Chamber of Commerce have aggressively fought to continually improve our area and will continue to do so.

Sincerely,

Kenneth E. Schwab

cc:Wood County Parks & Forestry

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07710

Kenneth

Schwab

RESPONSES TO COMMENTS

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 2

The activities described are occurring today, and do not raise any significant safety issues. If the proposed range expansion is approved, the airspace over the range would continue to be designated as restricted airspace, and other aircraft would be prohibited from using the airspace during the time the range is active.

2647 Hwy. 77 South
Nekoosa, WI 54457
November 4, 1997

Program Manager, Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500. Fitch Avenue
Andrews AFB
MO 20762-5157

Dear Sir:

I am against adding 6,000 more acres to the Hardwood bombing range in central Wisconsin. This will destroy forests, farmland, a cranberry marsh, and endanger animals and birds in the forest.

I also object to the noise of the low-flying jets. My 80 year old mother in Cranmoor, WI, lives along the flight path of these jets, and it is scary for her with the loud noise. It almost seems as if her house shakes. I am sure this is frightening to many other people (and animals).

Also in the township of Cranmoor there are low flying crop dusting planes for the cranberry marshes. I think there is a danger of a crash between a jet and a plane.

Sincerely,

Beverly Schraeder

472

Written Comment Form

NOV 5 1997

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: DOUG FURNIER
TITLE/ORGANIZATION: TSGT / HARDWOOD RANGE
ADDRESS: 713 N WATER SPARTA, WI 54656
(Street) (City/State/Zip)

- COMMENTS -

Most of the opposition to the range expansion appears focused on environmental concerns based on misinformation.

The following are some facts:

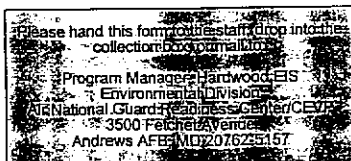
Live munitions are not dropped

Targets are drained of all fluids.

There is lots of wildlife on the range.

Anyone who has a friend or family member in the military should support this expansion. The range is an invaluable asset to fighter units in Wisconsin and surrounding states. The expansion would allow much more realistic training for these units without having to travel several hours or deploy as a squadron to accomplish the necessary training.

Range expansion would allow training requirements to be fulfilled much more economically & efficiently, possibly saving lives & definitely saving money.



RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Written Comment Form

NOV 5 1997

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Mary Richards

TITLE/ORGANIZATION: private individual

ADDRESS: 52291 805th Ave. Boyceville WI 54725

Please send me a final draft of the EIS. ^(Street) ^(City/State/Zip) This is a request for an official response.

It is not necessary to destroy our countryside in order to protect our country. We have a state law in Wisconsin to protect public forests for future generations. It is a violation of this law to cut down these forests for military use. It is an outrage to devastate our land in the name of security in an era when we have the technology to accomplish military training through simulation techniques. It is an insult to the citizens of Wisconsin to suggest that use of county forest land for a bombing range has no negative environmental impact.

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2

Please hand this form to the staff, drop into the collection box, or mail to:
Program Manager, Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fetchet Avenue
Andrews AFB, MD 20762-5157

RESPONSES TO COMMENTS

Response to Comment No. 1

Section 28.11(1) of the Wisconsin Statutes does not specifically state that military use of county forestlands is authorized or prohibited. In the past, the Wisconsin Attorney General's Office has stated that lack of specific statements giving authorization is a shortfall. One Attorney General stated this could be remedied by "either legislative amendments or the expansion of existing military establishments." Clearly, the pursuit of the expansion is what is now being addressed. However, this prohibition against use does not stop the withdrawal of the lands from the County Forest Law Program and sale of the lands for range expansion. That decision will be based on the results of the environmental studies. If a decision is made to expand the range, the county and the Wisconsin's Department of Natural Resources will be involved in the withdrawal process.

Response to Comment No. 2

The use of flight simulators for pilot training is already part of the training program for various aircraft using the affected airspace. The F-16 training regulation (AFI 11-F16) stipulates those activities that may be accomplished using simulators and those requiring actual flying. Although flight simulators work well for certain types of training (e.g., emergency procedures and instrument training), the complete substitution of simulator training for all flight training is not a viable alternative. In addition, the availability of simulators for on-going readiness training is limited.

474

Cd. Gov Thompson, Congressman Ober, Senator Kohl, Senator Feingold

080LO

Mary

Richards

11/6/97

RESPONSES TO COMMENTS

Dear Program Manager:

I am writing once again to oppose the expansion of the Hardwood Bombing Range on public forest lands in both Juneau and Wood Counties in the Central Wisconsin area. The Wood County Board is presently fighting to fulfill its mandate "to manage and protect" the county's public forest lands under the Wisconsin State Constitution. The Wood County Supervisors have requested that the public in the affected area write in protest of the proposed expansion, so here once again is a protest to the expansion of the bombing range on public forest lands in two Central Wisconsin counties.

The Ralph Allan family had been fighting for some thirty years to protect Juneau county forest lands as a valuable resource for the future. The Juneau County Board, however, has already made the decision that it will surrender some 3000 acres of public community forest to the expansion project should it go through--public county forest that has recently been converted to community forest to skirt the restriction on selling county forest--done decision, done deal. The public forest land issue remains the primary objection of the Ralph Allan family to the bombing range expansion.

I was recently stopped in a Nekoosa grocery store by a woman who reminded me to get my protest letter in the mail. She is concerned about family land that will be lost if the expansion goes through. So the loss of private lands is also an issue--residential lands, recreational lands, commercial lands.

There are others more qualified than I to offer evidence of the ~~air~~ ^{actual} congestion that already is involved and will be more so if the likelihood of expanded training takes place. The issue there is a big safety issue. Medical flights into the Marshfield Medical area are already being affected as are commercial flights into both Marshfield and Wisconsin Rapids.

So here again is a written objection to the Expansion of the Hardwood Bombing Range on public forest lands in both Juneau and Wood ~~counties~~ ^{in the} Central Wisconsin area.

Sincerely,
Ellen Allan (for Ralph)

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 2

The proposed range expansion is not anticipated to have an adverse impact on "Spirit of Marshfield" helicopter medevac operations. The Marshfield Base Manager has an agreement with Volk Field personnel which includes procedures to ensure that military flight operations will be curtailed, if necessary, to ensure that "Spirit of Marshfield" flights with patients will have direct, unimpeded access to their destination. In addition, Minneapolis Air Route Traffic Control Center personnel assign the necessary priority to "Spirit of Marshfield" flights to ensure direct light routing. The Marshfield Base Manager has also established an excellent working relationship with Volk Field personnel to ensure that problems are resolved as they are identified.

475

BR110

Ellen

Allan

November 6, 1997

Bruce Barrett MD PhD
2038 Irwin Place
Madison WI 53713

Col. Kent Adams
Program Manager - Hardwood Range EIS
Air National Guard CEVP
3500 Fetchet Ave
Andrews AFB MD 20762-5157

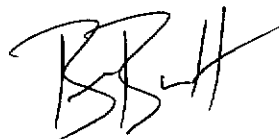
Dear Sir:

I am utterly amazed. Is it true that the military wants to condemn county forests in Wisconsin for use as a bombing range?

If so, and if this goes beyond the planning stage, you can count on vocal, visible and widespread resistance. I expect that editorials, petitions and lawsuits will be complemented by protests, demonstrations, and civil disobedience of the most active sort. I personally will help see to it that the noses of the responsible parties be rubbed in the most egregious material imaginable.

Thank you for your time and consideration.

Sincerely,



CC - Herb Kohl
Russ Feingold
T. Thompson
Ed Garvey

RESPONSES TO COMMENTS

Response to Comment No. 1

Land acquisition through condemnation would have similar socioeconomic effects to the acquisition of land through voluntary purchase and sale. Both would be based on the appraised value of the property and in both cases, relocation costs would be paid by the Federal government, private lands would be taken off the tax rolls once they are owned by the Federal Government, and the operation and potential socioeconomic effects of the expanded range would be similar.

Nov 6, 1997

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Dear Sir,
as a Korean Veteran 1952-54

I'm concerned about my neighbors lack of patriotism. I live approximately one mile north of the proposed expansion and would be less than honest if I said I'm not bothered at times by the jet activity. But it's a small price to pay for a secure protected country. As I tell my friends and neighbors when they complain, just be glad they are our planes not some enemies. I take comfort in the fact we have young Americans willing to serve their country in this way.

as far as taking this land out of public use, this is not true. as far as I know the

only area closed to hunting,
berry picking etc. is the target
area. In fact the acquisition
of the private land would
provide additional recreational
use on land now closed to
the public.

In closing I want to let
you know my family and I
support your efforts and hope
you are successful in expanding
the Hardwood Range.

Sincerely,
Bill Hemmerly
Box 104 Necedah Rd.
Babcock, Wi.
54413

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume 1 concerning incorporation of public comments).

November 6, 1997

Air National Guard
Program Manager, Hardwood Range EIS
ANGRC/CEVP
3500 Fetchet Avenue
Andrews Air Force, MD 29762-5157

I, as a concerned citizen of Wood County, would like to voice my opposition to the proposed expansion of the Hardwood Bombing Range.

It is very evident that there are no benefits for Wood County should the range be expanded as proposed, but there serious negative impacts. Wood County and the State of Wisconsin will lose over 6,000 acres of irreplaceable forest land currently being used for recreation, wildlife habitats, wetland preservation and timber production. There would be closure or relocation of six miles of state snowmobile trails, and closure of approximately 13 miles of public roads through the expansion area. Wood County would sustain an annual revenue loss of \$42,530.00 along with a loss of agricultural use and timber revenues on private lands, withdrawal of over 300 acres of private lands entered in Woodland Tax Law and Forest Crop Law contracts.

Each taxpayer in Wood County will sustain severe losses from any action that dis-integrates our ability to attract, retain, or expand existing business and industry. The people of Wood County have aggressively fought to continually improve our county and will continue to do so.



David Krekowski
5395 County Road F
Wisconsin Rapids, WI 54494

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

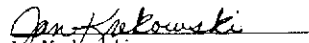
November 6, 1997

Air National Guard
Program Manager, Hardwood Range EIS
ANGRC/CEVP
3500 Fetcher Avenue
Andrews Air Force, MD 29762-5157

I, as a concerned citizen of Wood County, would like to voice my opposition to the proposed expansion of the Hardwood Bombing Range.

It is very evident that there are no benefits for Wood County should the range be expanded as proposed, but there serious negative impacts. Wood County and the State of Wisconsin will lose over 6,000 acres of irreplaceable forest land currently being used for recreation, wildlife habitats, wetland preservation and timber production. There would be closure or relocation of six miles of state snowmobile trails, and closure of approximately 13 miles of public roads through the expansion area. Wood County would sustain an annual revenue loss of \$42,530.00 along with a loss of agricultural use and timber revenues on private lands, withdrawal of over 300 acres of private lands entered in Woodland Tax Law and Forest Crop Law contracts.

Each taxpayer in Wood County will sustain severe losses from any action that dis-integrates our ability to attract, retain, or expand existing business and industry. The people of Wood County have aggressively fought to continually improve our county and will continue to do so.


Jan Krekowski
5395 County Road F
Wisconsin Rapids, WI 54494



Photography by Richard LaMartina



RR2 Box 69 • 43167 Gullone rd. • Guys Mills, WI 54631-9613
(608)-572-2302
e-mail: RICHARDL@msl.com

November 6, 1997

Col Kent Adams, Program Manager, Hardwood EIS
Air National Guard CEVP
3500 Fetchet Avenue
Andrews AFB, MD 20762-5157

Dear Col. Adams,

I am writing you to express my displeasure and anger that the Hardwood Bombing Range in Wisconsin will be expanded as planned. As you know, there is a large segment of the population directly affected by this proposal that is very much against it. I wrote in protest a couple years regarding the proposed low level flight corridor designed for Southwest Wisconsin. At that time I was not yet living here, and planned to move here because of the unique character of the area, including the quiet, rural atmosphere. I travel a lot for my work, and I have learned how truly rare a quiet environment is. Although the corridor plan was ultimately defeated, the expansion of the bombing range would still negatively affect this special place. There would not be low level flights, but there would still be fighter jets crossing our skies on a regular basis. They would still create a great deal of disturbance.

My other concern is what appears to be a blatant taking of public land. Wood county officials have stood firm in their refusal to withdraw the 6,000 acres of forest county land that is slated for the expansion, yet the military is prepared to condemn the land, if necessary, in order to get their way.

Please inform the military that State Statute 28.11 precludes using county forest land for a bombing range. Federal condemnation of county forest land is a violation of states' rights.

Thank you for your time and attention.

Sincerely,

Richard LaMartina

RESPONSES TO COMMENTS

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 2

Section 28.11(1) of the Wisconsin Statutes does not specifically state that military use of county forestlands is authorized or prohibited. In the past, the Wisconsin Attorney General's Office has stated that lack of specific statements giving authorization is a shortfall. One Attorney General stated this could be remedied by "either legislative amendments or the expansion of existing military establishments." Clearly, the pursuit of the expansion is what is now being addressed. However, this prohibition against use does not stop the withdrawal of the lands from the County Forest Law Program and sale of the lands for range expansion. That decision will be based on the results of the environmental studies. If a decision is made to expand the range, the county and the Wisconsin's Department of Natural Resources will be involved in the withdrawal process.

November 6, 1997

Air National Guard Readiness Center
Program Manager, Hardwood EIS
ANG RC / CEVP

3500 Fitchet Ave.
Andrews Air Force Base, MD 20762-5157

Dear Sir:

Following is some feedback to the DEIS and my major concerns regarding the proposed expansion of the Hardwood Bombing Range.

My first issue with the proposed Bombing Range is contamination of our ground water. Our water is one of the most precious resources we have in this state and on our planet. I don't have to tell you that pure water is much more valuable than contaminated water! Once water is damaged it is much more difficult to bring back than it would be to PREVENT contamination in the first place. Please consider the good sense of this.

Secondly, I feel concerned about the wildlife. The associated noise and more congested airspace certainly would make an impact. This negative impact could potentially affect the survival of many individuals through stress and noise contamination. Looking at the whole picture it is clear that plants and animals living amid contaminated habitat become affected. In this

RESPONSES TO COMMENTS

Response to Comment No. 1

Background information discussing the geology and physiography of the area is provided in Subsection 3.5.1.1. This Subsection describes effects from the historic occurrence of the glacial lake, Lake Wisconsin, on the soils and geology of the area. Descriptions of groundwater resources in the area and baseline water quality are provided in Subsection 3.6.1.2. As discussed, the elevation of the shallow aquifer often raises above the ground surface level during periods of high precipitation, demonstrating that strong relationships exist between surface water and groundwater. Potential sources of pollutants to surface and groundwater in the range expansion area are from aircraft mishaps (i.e. crashes) and from munitions. These sources and the fate of potential pollutants are discussed in Subsection 3.3.3.1 (Aircraft Mishaps), Subsection 3.3.4.1 (Munitions Use and Handling), and Subsection 3.4.1 (Hazardous Materials and Solid Waste). Potential impacts to both surface and groundwater resources and water quality are discussed in Subsections 4.6.2.1, 4.6.2.2 and 4.6.2.3. Based on the information provided in Section 3, adverse impacts to surface and groundwater quality or drinking water supplies would not be expected. Subsection 4.5.2.3 (Water Quality) was modified to reference the identified appropriate sections in Section 3 and discuss conclusions regarding groundwater quality.

Response to Comment No. 2

The best available information indicates that the effects of aircraft overflights on wildlife and livestock are generally short-term and minor, with no mechanism for long-term effects such as reduced reproduction, increased mortality, or habitat abandonment. Noise impact studies from a variety of military use areas were considered in the impact analysis process. Refer to Subsection 4.8.1.3 of this EIS for further discussion of noise impacts to wildlife.

case, they are in our hands; they are under our protection.

Then there is the risk of airplanes dropping from the sky. Anyone who has been listening to the news in recent years knows this is a growing concern. With the proposed increased air traffic of the additional pilots flying to the proposed Bombing Range, those of us living in the outlying areas have an increased risk. Personally, I'd prefer to have less air traffic.

Overall, what could possibly be so important about practice bombing that we'd be willing to sacrifice our health, land, water, and wildlife?

Finally, I find it frustrating that many of my concerns were not thoroughly addressed in the DEIS. I thought that was a main purpose of the document. Truthfully, I expected more. We've certainly paid for it in tax dollars. How much money was actually spent in its preparation?

Sincerely,

Susan Presser
RT+2 Box 69
Days Mills, WI 54631

RESPONSES TO COMMENTS

Response to Comment No. 3

As described in Subsection 3.3.3.1 of the EIS, the Class A mishap rates reflected in the document consider the life-time operational use of the aircraft, under all conditions of flight. Therefore, any mishap occurring during any phase of flight is reflected in the statistic. As discussed in the EIS, risks associated with aircraft mishaps is low.

A complete discussion of Class A mishap rates is contained in Subsection 3.3.3.1 of the EIS. Tabulation of statistical projections for Class A mishaps for each aircraft using the airspace associated with this proposal is presented in Subsections 3.3.3.1 and 4.3.3 for current and proposed use conditions, respectively.

Response to Comment No. 4

The ANG cares about the people that live near their training areas and how they feel about the activity associated with training. The NEPA process is providing the ANG with an opportunity to hear exactly what the public feels about its proposal before any decisions are made. Every scoping comment and every comment on the draft EIS sent to the ANG has been read and incorporated into the administrative record for the proposal. Public comments have provided a better picture of what subjects the public wanted addressed in the document and have enabled the ANG to improve the EIS by focusing attention on specific issues for discussions in the EIS.



SAVINGS BANK

November 6, 1997

Program Manager, Hardwood EIS
Environmental Division
Air National Guard CEVP
3500 Fetchet Avenue
Andrews AFB, Maryland 20762-5157

Dear Sir or Madam:

I am writing this letter to oppose the intended expansion of the Hardwood Air-To-Surface Gunnery Range in Wood County, Wisconsin.

Although I am very much in agreement that we need a strong, well prepared military, I am not sure expansion in Central Wisconsin is the place to do so. With the Pentagon and the Federal Base Closure Commission closing bases throughout the country, I would think one of these bases would be an ideal candidate.

The Central Wisconsin area is trying to attract industry to our area and the expansion of this range would have a negative impact on general aviation and air commerce at the Marshfield Municipal Airport, along with the emergency helicopter flights of the Spirit of Marshfield, based at St. Joseph's Hospital. If expansion is an absolute necessity, I would suggest to expand in Juneau County where the Federal Government owns 75,000 acres of undeveloped land.

In closing, I ask that you reconsider the expansion of the Hardwood Range in Wood County for the economic and social benefit of the Marshfield area.

Sincerely,

Orin C. Toltzman
Orin C. Toltzman
President

OCT/ge

RESPONSES TO COMMENTS

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 2

The proposed range expansion is not anticipated to have an adverse impact on "Spirit of Marshfield" helicopter medevac operations. The Marshfield Base Manager has an agreement with Volk Field personnel which includes procedures to ensure that military flight operations will be curtailed, if necessary, to ensure that "Spirit of Marshfield" flights with patients will have direct, unimpeded access to their destination. In addition, Minneapolis Air Route Traffic Control Center personnel assign the necessary priority to "Spirit of Marshfield" flights to ensure direct light routing. The Marshfield Base Manager has also established an excellent working relationship with Volk Field personnel to ensure that problems are resolved as they are identified.

The Air National Guard has no jurisdiction to acquire lands presently under the administration of another Federal agency. Lands such as the Necedah National Wildlife Refuge already have a specific mission in their own right and therefore represent an extremely undesirable alternative to fulfill the need expressed by the Proposed Action.

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DARLO

Orin

Toltzman

RESPONSES TO COMMENTS

November 7, 1997

Col. Kent Adams
Program Manager Hardwood EIS,
Air National Guard CEVP
3500 Fetchet Ave.
Andrews AFB, MD 20762-5157

Dear Colonel Adams:

The threatened federal condemnation of county forest lands in Wood County, Wisconsin, in order to expand bombing runs—as outlined in the National Guard's Draft EIS—is clearly wrong.

It is a violation of a public trust, as such forest lands belong to the people of Wisconsin and to its future generations.

It is a violation of the will of the citizens of that area, expressed by Wood County officials who have refused to "sell out" to the wishes of the National Guard.

It reinforces a perception of bad faith on the part of the Air National Guard, who have already rudely overstepped in many areas the original limited space granted them in those forest lands.

It further shows the insensitivity of the military to a world grown weary of lands devastated and rendered lethal to any future civilian use by unexploded "ordinance," be it (in this case) bombs dropped from planes or (in others) hidden land mines left all about.

As a citizen of the State of Wisconsin, I strongly opposed any actions by the military, via the Pentagon and federal offices, that countermand or sidestep the will of the people of this State with regard to its publicly-owned lands. I shutter to think that the U.S. military can simply do as they please, when what is sought by them is clearly and expressly opposed by the citizenry of a State that first offered them a home base.

Sincerely,



Rev. Robert J. Koszarek
P.O. Box 728
Eagle River, WI 54521

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

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Fehrman Insurance Associates, Inc.

1905 Washington Street
Wisconsin Rapids, Wisconsin 54484
715-422-5850 Fax 715-423-2353

November 10, 1997

Air National Guard Readiness Center
Program Manager, Hardwood Range EIS
ANGRC/CEVP
3500 Fetchet Avenue
Andrews AFB, MD 20762-5157

As an active sportsman and small business owner in Wood county, I would like to voice my opposition to the proposed expansion of the Hardwood Bombing Range.

It is evident there are no benefits for Wood county should the Range be expanded as proposed, yet there are serious negative impacts. Please consider the following points:

1. Wood County and the state of Wisconsin will lose over 6000 acres of irreplaceable forestland currently being used for recreation, wildlife habitat, wetland preservation, and timber production.
2. As taxpayers in Wood County, we will sustain severe losses from any action that disintegrates our ability to attract, retain, or expand existing business and industry.
3. This taking of affected land-owners' property and the detrimental effect of noise pollution on cranberry growers, their families and employees is unconscionable.

Let it be known, the people of Wood County will fight to prevent a degradation of our area.

Sincerely,

Gary W. Fehrman

RESPONSES TO COMMENTS

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 2

As of this publication, the Air National Guard has not received any proposals that could be construed as an approach to provide alternate lands that could replace lands lost if the Department of Defense approves the range acquisition, as outlined in Section 1. If the acquisition occurs, it is anticipated that a majority of the forest lands and agricultural uses would remain as they exist today. If the Department of Defense approves the acquisition, depending on how it is accomplished (i.e., fee simple purchase, leasing from owners or the State, license, etc.), replacement lands would be an action that the State of Wisconsin or Wood County could address, as appropriate.

Response to Comment No. 3

The socioeconomic analysis in the EIS (Subsection 4.12) and Appendix I discuss estimated impacts to the local economy and to public revenues. Specific impacts on future economic growth outside of the range are unknown and attempts to quantify them would be speculative given the numerous factors that affect business and economic decisions. However, secondary effect have been incorporated into the report.

Response to Comment No. 4

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

RESPONSES TO COMMENTS

Gottschalk Cranberry, Inc.
412 Daly Avenue
Wisconsin Rapids, WI 54494-4744
(715) 422-1200

emailguy@wctc.net

November 10, 1997

Program Manager, Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fetchet Avenue
Andrews AFB, MD 20762-5157

Dear Sir or Madam:

We strongly oppose the proposed expansion of the Hardwood Range in Wisconsin, for many reasons. This misguided proposal has already cost the taxpayers thousands upon thousands of wasted dollars, and it appears that the military is willing to squander thousands more on what is simply a bad idea.

The draft Environmental Impact Statement (EIS) is a pathetic joke which at the same time is ridiculously biased and lacking in fact. It tries to lead the reader to the conclusion that this bombing range expansion will actually benefit the surrounding environment! Absurd!

The draft EIS completely ignores the deleterious effects on trumpeter swans and other endangered resources. It also skips over the issue of wetland mitigation, and gives short shrift to alternatives, like the closing K.I. Sawyer base in Michigan.

If it weren't a complete waste of time and resources, the EIS should be completely redone. Rather, the Air National Guard should come to it's senses and pull this range expansion proposal off of the table -- it is unwanted and unneeded.

Sincerely



Guy A. Gottschalk, President

Response to Comment No. 1

The best available information indicates that the effects of aircraft overflights on wildlife, including trumpeter swans (i.e., Henson and Grant 1991), are generally short-term and minor. Short-term responses such as alert postures have no identifiable mechanism for long-term effects such as reduced reproduction, increased mortality, or habitat abandonment. Noise impact studies from a variety of military use areas were considered in the impact analysis process. Refer to Subsection 4.8.1.3 of this EIS for further discussion of noise impacts to wildlife.

The ANG firmly commits to not impact wetlands in development of the proposed expansion area; however, Executive Order 11990 which calls for "no net loss of wetlands" does not preclude the development of projects within a wetland as long as no practicable alternatives exist and that the proposal includes all practicable measures to avoid wetlands impacts. Assuming the expansion is approved, the proponent would be required to obtain an individual Clean Water Act Section 404 permit for any activities occurring within wetlands or other waters of the United States. Issuance of a Section 404 permit requires a demonstration that the Section 404 (b)(1) Guidelines have been followed. The Guidelines require that the project avoids and minimizes impacts to wetlands to the extent possible and provide mitigation for unavoidable impacts. Once specific designs and locations for the landing zone, drop zone, and target area(s) are available, the ANG will conduct jurisdictional wetland delineations to facilitate the assessment of specific project components (and alternatives) on wetland resources, as applicable. Subsection 4.6.2.4 of the EIS discusses requirements under Executive Order 11990, Protection of Wetlands, Section 404 of the Clean Water Act, and Chapter NR 299 of the Wisconsin Administrative Code.

The use of other training areas was examined as part of the development of the alternatives studies in the EIS and is given in Subsection 2.3.2. The proposal was designed to minimize conflicts with potentially sensitive areas while providing the training resources necessary to meet military readiness requirements. Because of limited fiscal resources and aeronautical constraints, virtually all of our nation's fighter units train in airspace that is within a "tank of gas" of the aircrews' home station.

Response to Comment No. 2

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).



Midwest Treaty Network

SOUTH/CENTRAL WISCONSIN OFFICE:
731 State Street, Madison WI 53703 USA
TEL/FAX: (608) 246-2256
E-MAIL: mtn@igc.apc.org
WEB SITE: www.alphacdc.com/treaty

November 10, 1997

Col. Kent Adams,
Program Manager, Hardwood EIS
Air National Guard CEVP
3500 Fetchet Avenue
Andrews AFB, MD 20762-5157

Dear Colonel Adams,

The Midwest Treaty Network is an alliance founded in 1989 of about 30 Indian and non-Indian groups in Wisconsin, Minnesota, and Michigan, supporting Native American sovereignty. We have successfully pursued statewide, national and international campaigns in support of treaty rights and in opposition to mining companies. We are alarmed that a new threat has materialized to Native and non-Native residents of Wisconsin in the form of a bombing range expansion.

We will not tolerate the condemnation of 6000 acres of Wood County Forest Land in central Wisconsin for use as a bombing range. We are in support of the Ho-Chunk Nation, Coalition for Peaceful Skies, farmers' organizations, peace and environmental groups, and other Wisconsin citizens who are opposing the forced expansion of the Hardwood Bombing Range under eminent domain.

The Wood County government has courageously represented its constituents in unanimously refusing to sell the land in question. The National Guard, however, prepared an Environmental Impact Statement (EIS) that did not fully study the impact of the expansion, and the Wisconsin Department of Natural Resources is not enforcing State Statute 28.11, which expressly protects public forests for future generations. If the federal and state governments have let down the people of Wisconsin, to whom do we turn for our democratic rights?

We strongly support the Ho-Chunk Nation in its opposition to the range expansion. We are aware that, throughout the continent, Native peoples bear the brunt of low-level test flight programs and bombing ranges. Midwest Treaty Network leadership has personally met with representatives of the Innu Nation in Labrador and Quebec, and the Western Shoshone in Nevada. We are aware of the intense opposition and direct actions carried out by these tribes against military jet operations, as well as the strong unity that they have built with local white residents who share their concerns.

We do not want the international media spotlight to be shown on Wisconsin, just at a time when better relations are being built with the Native American nations within our borders. However, we will certainly be involved in global fax, e-mail, and action campaigns to increase media exposure in the event that the forced expansion of the bombing range proceeds.

Sincerely,


Debra McNutt


Zoltán Grossman

cc: Sen. Herb Kohl,
Sen. Russ Feingold,
Mr. Ed Garvey

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 2

The Ho-Chunk and Menominee Tribes have been contacted and issues relevant to Native American concerns have been discussed. The Tribes have indicated that further consultation would be necessary should the ANG acquire the land. The ANG currently has a coordination system in place with the Ho-Chunk Nation that provides for a 5 NM avoidance area during any of their special observances or ceremonies. This system is on an "as called for" basis and is implemented by NOTAM and direct communication with daily users. Correspondence associated with those coordination initiatives are presented in Appendix O to the Final EIS.

09/21/00

Debra

McNutt

3025 Bay Settlement Rd.
Green Bay, WI.
November 10, 1997

RESPONSES TO COMMENTS

Response to Comment No. 1

Section 28.11(1) of the Wisconsin Statutes does not specifically state that military use of county forestlands is authorized or prohibited. In the past, the Wisconsin Attorney General's Office has stated that lack of specific statements giving authorization is a shortfall. One Attorney General stated this could be remedied by "either legislative amendments or the expansion of existing military establishments." Clearly, the pursuit of the expansion is what is now being addressed. However, this prohibition against use does not stop the withdrawal of the lands from the County Forest Law Program and sale of the lands for range expansion. That decision will be based on the results of the environmental studies. If a decision is made to expand the range, the county and the Wisconsin's Department of Natural Resources will be involved in the withdrawal process.

Col. Kent Adams
3500 Fetchet Ave.
Andrews AFB, MD.

Dear Col. Kent Adams:

I wish to protest the expansion of the Hardwood Bombing Range onto 6,000 acres of Wood County Forest land.

Our State Statute 28.11 expressly protects public forests for future generations. To expand the bombing range would make a mockery of this statute.

We in Wisconsin are firmly convinced that we will not tolerate the condemnation of our County Forest Land for use as a bombing range.

We rely on your sense of justice to support our cause.

Sincerely,

Sr. Carlotta Ullmer

Sr. Carlotta Ullmer

November 12, 1997
1081 Second St
Port Edwards, WI 54469

Program Manager
Hardwood EIS Environmental Div
Air National Guard Readiness Center/CEVP
3500 Fetchet Ave.
Andrews AFB, MD 20762-5157

Dear Program Manager,

I'm writing to protest the expansion of the Hardwood Bombing Range into Wood County, WI by the Air National Guard.

This would "lower the bottom altitude and expand the lateral confines of Restricted Airspace 6904B..and it would also increase the altitude in 6094B to Flight level 250 and..up to FL 500, on an as needed basis." (page viii of DEIS of August 1997.

This expansion would markedly interfere with most of the civilian airfields of Wisconsin Rapids, Marshfield, Neillsville and other nearby airfields.

I know what this means as I was on a plane out of Central Wisconsin to Chicago on June 6, 1997 when the pilot told us it would be a very rough ride due to military maneuvers in the same airspace which meant we would be flying at a much lower altitude. It was scary and unsafe to be in the same airspace with military planes.

Who was practicing? What type of planes were used? We never will know.

The ANG tells us that the number of this type of military maneuvering over civilians will increase with the proposed expansion into Wood County Forest Land. It could be as high as more than 4,000 flights in a year.

The Department of Defense budget is reducing its aircraft and personnel and bases. On page 1-2 of the DEIS, 1st paragraph, is the following statement.

"The Air Reserve Components, such as the ANG, are also reducing in size but at a slower rate. As a result, the ANG's percentage of total force (i.e., active duty, ANG, and Air Force Reserve) is increasing."

This makes sense only to an ANG Unit that wants to increase its BOMBING and STRAFING over our Wood County Forest land.

If the ANG is expected to train at "the same standards established by the USAF for active duty units" it must do so at USAF Training Fields.

Again, I ask you to reconsider the ANG's plans to expand. If the ANG is really "reducing at a slower rate" this proposed expansion is an excellent place to begin their reduction of flights and training by moving to an USAF Field.

Thank you for reconsidering this expansion.

Nov. 10, 1997
Patricia Buehler

Patricia Buehler

RESPONSES TO COMMENTS

Response to Comment No. 1

This proposal will not expand the lateral boundaries of any of the military operations areas (MOAs) that Volk Field personnel currently schedule and manage. Therefore, this proposal should not adversely affect travel for local business executives. The ANG recommends that interested parties call Volk Field at (608) 427-1201 to resolve current operations problems involving local and military aircraft. Aircraft on a VFR flight plan are authorized to transit MOAs at all times at the pilot's discretion. To help determine if the MOA is scheduled to be used during the desired transit time, pilots can call (800) 972-8673 or listen to an ANG-sponsored airspace information system recording broadcast on frequency 120.0 MHz. The ANG initiated this recording as a service to pilots so they can plan their flights knowing the military's planned activities. The aircraft have unimpeded access to MOAs during periods of non use.

Response to Comment No. 2

The Minneapolis Air Route Traffic Control Center, the agency responsible for providing safe separation for all aircraft on an instrument flight plan, routinely routes commercial aircraft away from military aircraft while they are maneuvering. This is done to ensure the safety of all aircraft and their passengers. When the military is not using the airspace for maneuvers, the airspace is available for general and commercial aviation pilots to transit. The ANG wants aircraft to have unimpeded access to MOAs during periods of non use. This proposal will incorporate the safety measures currently in use to ensure safe separation for general, commercial, and military aircraft.

Response to Comment No. 3

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

NOV 12 1997

Air National Guard Readiness Center
 Program Manager, Hardwood Range EIS
 ANGRC/CEVP
 3500 Fetchet Avenue
 Andrews Air Force Base, MD 20762-5157

The Board of Directors of the Wisconsin Rapids Area Chamber of Commerce, voted unanimously to go on record in opposition of the proposed expansion of the Hardwood Bombing Range.

I, the undersigned Wisconsin Rapids Area Chamber of Commerce member, would like to voice my opposition to the proposed expansion of the Hardwood Bombing Range into the Wood County area.

It is evident that there are no benefits for Wood County should the range be expanded as proposed, yet there are serious negative impacts. Wood County and the State of Wisconsin will lose over 6,000 acres of irreplaceable forestland currently being used for recreation, wildlife habitats, wetland preservation and timber production. Furthermore, attempts by Wood County to identify replacement lands have been met with persistent, severe opposition. Each taxpayer in Wood County will sustain severe losses from any action that disintegrates our ability to attract, retain, or expand existing business and industry.

The people of Wood County and members of the Wisconsin Rapids Area Chamber of Commerce have aggressively fought to continually improve our area and will continue to do so.

*Outlepen for Office Sc.
 by Gary. Rob Outlepen, Jr.*

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

November 12, 1997

RESPONSES TO COMMENTS

Program Manager
Hardwood EIS, Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fetchet Avenue
Andrews AFB, MD 20762-5157

Attn: Program Manager - Hardwood EIS

"Small airplane run over by military jet". Expect to read this headline if we expand the Hardwood Range.

I have been a commercial pilot in the Central Wisconsin area for thirty years. Never have I observed so many low flying military aircraft as I have in the last few years. By low flying, I mean two to three hundred feet over Marshfield and Neillsville. The military cannot seem to keep their aircraft where they are supposed to be. Enlarging the area will only make things even more unsafe.

Another example of use of normal airspace by the military was observed again on Saturday, October 18, 1997. I was doing flight training at Eau Claire, Wisconsin, when four C-130's started making approaches into one of the only full instrument runways in our area. To make matters even worse, the C-130's then decided to hold in an area well known for sky diving.


Taking more land and saying it is for military training is ludicrous. The military can go where and when it wants. So the question that I have is "what about safety?"

There is also the question, "what effect will this range have on jet arrivals into Chicago, Milwaukee, and Minneapolis, which now go around the restricted areas?"

In conclusion, there is no reason to expand the range. The military will use what they need. The United States has enough restricted areas. Let us just make better use of the ones that we have.

I really believe that there will be a jet running over a civilian aircraft (accident) if the expanded range becomes a reality. I can only hope and pray that it is not one of the five pilots in this family.

Sincerely,


Daniel Maurer
410 N. Meadow Lane
Marshfield, WI 54449

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 2

Safety issues associated with the proposed activities are addressed in Subsections 3.3 and 4.3 of the EIS.

Response to Comment No. 3

The Minneapolis and Chicago Air Route Traffic Control Centers will evaluate the impact of this proposal on traffic flow and will include their evaluation during the review process.

Response to Comment No. 4

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).



CPAs • CONSULTANTS • ADVISORS

Delivering innovative business solutions

503 South Cherry Avenue
PO Box 260
Marshfield, WI 54449-0260
715-382-1710
Fax: 715-382-2480

November 12, 1997

Program Manager, Hardwood EIS
Environmental Division
Air National Guard CEVP
3500 Fetchet Ave.
Andrews AFB, MD 20762-5157

RE: Hardwood Air Expansion

This letter is written to state my opposition to expansion of the Hardwood Air to Surface Gunnery Range. As a CPA and member of our community Industrial Park Authority I am very involved in the business community and the economic health of the community. Any actions that will restrict our access to our local airport would have a detrimental impact on attracting new business as well as retaining and expanding our existing business base.

1

The Marshfield community is a major hub of medical services and this expansion could have a negative impact on the ability of the medical helicopter transports to serve our area. Therefore I believe expansion of this Hardwood Range should not be done at this time.

2

Sincerely,

Phillip M. Stefanik
Certified Public Accountant

PMS:lmh

RESPONSES TO COMMENTS

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 2

The proposed range expansion is not anticipated to have an adverse impact on "Spirit of Marshfield" helicopter medevac operations. The Marshfield Base Manager has an agreement with Volk Field personnel which includes procedures to ensure that military flight operations will be curtailed, if necessary, to ensure that "Spirit of Marshfield" flights with patients will have direct, unimpeded access to their destination. In addition, Minneapolis Air Route Traffic Control Center personnel assign the necessary priority to "Spirit of Marshfield" flights to ensure direct light routing. The Marshfield Base Manager has also established an excellent working relationship with Volk Field personnel to ensure that problems are resolved as they are identified.

493

John C. Wigand

797 Thomas Drive
Sun Prairie, Wisconsin 53590-2377

Phone 608-837-9258

12 Nov 97

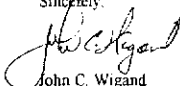
Program Manager Hardwood E.I.S.
Air National Guard CEVP
3500 Fechet Ave.
Andrews AFB, MD. 20760-5157

To Whom It May Concern:

This is to inform you of my disgust to learn of the tactics employed by the Air National Guard regarding the so called acquisition of public lands in Wood County, Wisconsin. The condemnation of public property and the manipulation of statistics represents an outrage and continues the litany of abuses historically perpetrated by all branches of the military in furthering its own agenda. These kinds of policy decisions always reflect the myopic perspective of a few misguided individuals, irrespective of true need and the desires and wishes of the people affected by policy.

I wish to go on record as opposed to the expansion of the low level flight plan for Wood County or any other site either inside or outside the borders of the state of Wisconsin. I plan on sharing my sentiment with my elected officials and others and asking them to look into and speak to this issue as well.

Sincerely,


John C. Wigand

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

RESPONSES TO COMMENTS

November 13, 1997


Air National Guard Readiness Center
Program Manager, Hardwood Range EIS
ANGRC/CEVP
3500 Fetchet Avenue
Andrews Air Force Base, MD 20762-5157

Re: Wood County, Wisconsin

Dear Program Manager:

I am writing to oppose the sale of part of Wood County, Wisconsin, to the Air National Guard as a bombing range. I hate to see more of our state be taken away from its natural beauty and recreational use, and instead filled with airplane traffic and the trash of detonated and undetonated bombs. There is so much pressure on our forests and wild lands from commercial and housing development. I believe that in the future we will find our protected forest lands much more valuable than any other use we can imagine today. I have a copy of the Environmental Impact Statement dated August 1997. Page xiii lists a number of "other alternatives not carried forward for detailed study", including flight simulators, electronic scoring, sharing the range at Fort McCoy with the US Army. I am sure that the Air National Guard can find a way to practice bombing to sufficiently defend the state of Wisconsin. But we will not be able to easily replace our hardwood forests.

Sincerely,



Susan Borri
1420 N. Marshall St. #200
Milwaukee WI 53202-2761

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Esty Dinur
7080 County Rd. H
Arena, WI 53503

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Col. Kent Adams, Program Manager, Hardwood EIS
Air National Guard CEVP
3500 Fetchet Avenue
Andrews AFB, MD 20762-5157

11/13/97

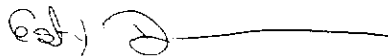
Dear Col. Adams:

I write to express my strong objection to the plan by the Wisconsin National Air Guard to expand its bombing range in Wood County, Wisconsin. It is inconceivable to me that the military would condemn County Forest Land for use as a bombing range.

I have spoken to people who live in the area the military wants to appropriate. They told me about the serious environmental degradation that already exists due to the present use of forest land as a bombing range. I agree with them wholeheartedly that we should not allow any additional damage.

I ask that you heed the voices of the citizens who maintain these lands with their tax money and rescind the plan for expansion of the bombing range. I trust that common sense will prevail in this case.

Sincerely,



Esty Dinur

cc: Senator Herb Kohl
Senator Russ Feingold
Ed Garvey

Written Comment Form

NOV 13 1997

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

RESPONSES TO COMMENTS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Patricia DeMark, Executive Director, Wisconsin Wildlife Federation

TITLE/ORGANIZATION: Proprietor, Conucopia

ADDRESS: P.O. Box 534, Hillsboro, WI 54630

Please send me a final draft of the EIS. This is an official Request

The purpose of the military is to defend our rights as citizens within our democratic country. However, when the military disregards the wishes of its people to preserve our public forests for future generations this does not speak to me as a democratic process.

With the technology available today, bombing practices can be more realistic and harmless to the environment by using computer simulators.

Because Waup County supervisors refuse to sell or lease their previous 6,000 acres of county forest land to the military, the federal government must condemn said land. Condemnation of public forest land to acquire for use as a bombing range is ludicrous & unnecessary. The acquisition of the additional 6,000 acres would still not be enough for a "proper" bombing range size. So where + what will the military need to condemn next??

STOP THE BOMBING!

Please hand this form to the staff, drop into the collection box, or mail to:
Program Manager, Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fetchet Avenue
Andrews AFB, MD 20762-5157

Close The Range!

Response to Comment No.1

The use of flight simulators for pilot training is already part of the training program for various aircraft using the affected airspace. The F-16 training regulation (AFI 11-F16) stipulates those activities that may be accomplished using simulators and those requiring actual flying. Although flight simulators work well for certain types of training (e.g., emergency procedures and instrument training), the complete substitution of simulator training for all flight training is not a viable alternative. In addition, the availability of simulators for on-going readiness training is limited.

Response to Comment No.2

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

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1

2

Written Comment Form

NOV 13 1997

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE
HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

RESPONSES TO COMMENTS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Georgia Nonnarts Georgia Nonnarts

TITLE/ORGANIZATION: Co-owner Hill/Hart & Co.

ADDRESS: 11707 Ziegler Ln Hillsboro (Ga) 30146-34

Please send me a final draft of the (City/State/Zip)

- COMMENTS - EIS. This is an Official Request

Even worse is for some reason, we have
the bombing, Overdage, Shale & Rade, the deep hang
close to the bank as to the 22nd. It is very
disturbing to us humans. What are our
rights - Our human rights - our rights. When
the military is so powerful on our way.

What about the bank? Look like a mosque,
do we need more security than I don't think
so. What about the people living close to
the bank? The stress on them? The cost to society
of the sickness care system? What about the
the votes count? What about technology with
all the advances, in computer, in hardware
or practice without destroying some of the
human rights?

What about the STOP!!

STOP!!

STOP!!

STOP!!

STOP!!

STOP!!

STOP!!

Please hand this form to the staff, drop into the collection box, or mail to:
Program Manager, Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fetchet Avenue
Andrews AFB, MD 20762-5157

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No.2

The use of flight simulators for pilot training is already part of the training program for various aircraft using the affected airspace. The F-16 training regulation (AFI 11-F16) stipulates those activities that may be accomplished using simulators and those requiring actual flying. Although flight simulators work well for certain types of training (e.g., emergency procedures and instrument training), the complete substitution of simulator training for all flight training is not a viable alternative. In addition, the availability of simulators for on-going readiness training is limited.

498

STOP!!
STOP!!
STOP!!

C. G. Thompson, Lawrence, Ohio. Senator Kohl. Send for Feingold

10210

Georgia

Nonnarts

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

11/13/97

Col. Kent Adams,

I am writing to express my distress over the efforts to expand the Juneau County Air National Guard bombing range onto public land. I believe that it is wrong to destroy county forest land that has been set aside in such a way for current and future generations. Surveys of existing pollution on the ground and in the water have not been made. Most everybody knows what a bombing range is though; it means permanent damage to the land and, collectively, the people. I think that the condemnation of their public forests for military purposes is not what most Wisconsinites want. If the public lands are just handed over to the military and industrialists, there's no visible end to where the intrusion may stop. The Pentagon and the Weekend Warriors do not need 22 thousand acres of beautiful Wisconsin land to blow up. Thank You for your time.

Nicholas Arthur Noll
1703 Rowland Avenue
Madison, Wisconsin 53704

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

418 Sixth St
Neenah WI 54956
November 13, 1997

Col Kent Adams, Program Manager
Hardwood EIS

We the F.O.R. Group in the Fox River Valley are very concerned and very much against the Hardwood Range Expansion. Our group has studied your impact statement. We do not see your reason for expansion particularly in a time of peace.

In studying the impact statement we came across many statements of great concern to us, greatly affecting our environment.

Several Endangered Species will be threatened. See Table 3-19 and 3-20 on pages 3-54. For small mammals physical changes indicate increased stress. pages 4-5. Concerning the Ground water pages 3-32. Increased soil erosion, change in drainage, change in flood water attenuation and storage 4.6.4 on pages 4-29. These are just a few concerns we found that I am mentioning here.

I am personally urging you to please stop the Hardwood Range Expansion and Bombing.

Sincerely
Sandra M Trochinski

RESPONSES TO COMMENTS

November 14th, 1997

Dear Program Manager, Hardwood EIS:

I am opposed to the expansion of the Hardwood Bombing Range in Juneau and Wood counties. There are several reasons for this:

1. In years past while hunting around the range in Wood, Juneau, Clark, and Jackson counties, the noise level from planes bombing was so deafening that I couldn't even hear a bird flush. How bad will it get with all the extra flights that they want? Also, how much extra stress will this put on wildlife, as well on the people living in these areas?
2. With the guards taking the extra 6,162 acres of land, this will take-away from the public who use this land for hunting, sight-seeing, berry picking, and many more uses. Where will this land be replaced? It simply cannot!!
3. As of late there have been many Military planes crashing. With all the extra flights at the range this will have the potential of more crashes in this area, making it more dangerous for the people living in the surrounding areas. Over 2,000 sorters per year with flights as low as 300 feet will be included in the new training sorts.
4. Air and water quality are also a concern. What extra strain will this put on our wildlife, such as migratory birds, deer, coon, partridge, squirrel, rabbits, and many others?
5. What impact will this have on the Sandhill Wildlife area, Meadow Valley, and the Necedah Wildlife Refuge areas?
6. I am also concerned that we are not getting the help that we want from our State Representatives that we need. It seems to me that the A.N.G. has been trying to sway our representatives to their side, by giving them rides in their fighter jets. Would they also be willing to give the public these same opportunities?
7. What about the private lands they want – Cranberry Growers, Tree Farmers, and Sportsmen, etc.? I'm not very sure that they want their lands taken from them.
8. There are only a few that favor the Hardwood expansion, against many that don't want it. It seems to me that the A.N.G. is going to ram this down the public's throat, whether they like it or not!

I am not against the A.N.G. and think that the training is a vital part in protecting our country. There are alternatives to the expansion of the Hardwood Range. Many Airforce Bases have been closed in the past, making them available for use. There are many areas in the country that are not populated and not in use, like this area currently is. Why is the A.N.G. so intent on this area that they will go to any lengths to get what they want, against all of the people that don't want it?

Thank you for taking time to read my concerns on this issue. Any consideration concerning the Hardwood Expansion would be very much appreciated.

Sincerely,

Robert F. Engel
12130 52nd Street South
Wisconsin Rapids, WI 54494

Response to Comment No. 1

As recognized in Subsection 4.2.1.1 of the EIS, noise is unwanted sound, and it is one of the most common environmental issues associated with aircraft operations. Data on sound levels created by F-16 aircraft at varying distances have been added to the text of the document. None of these sound levels is loud enough to cause physical harm, but some are loud enough to startle or create annoyance. Noise impacts depend not only on the maximum sound level, but also on how long each event lasts and how often the event occurs. Day-Night Average Sound Levels (Ldn and Ldnmr) are used in the noise analysis because they have been found to best reflect the combined effect of these quantities. Additional information on the use of cumulative noise metrics is contained in Subsection 3.2 and Appendix F in the EIS.

Studies conducted on wildlife have shown that numerous wildlife species have the ability to adapt to the presence of man and various man-made sound sources, including jet aircraft noise. While the noise generated from low-altitude military overflights may be initially startling, habituation to jet aircraft noise occurs with most wildlife species. Species-specific responses to low-altitude overflights vary considerably, and responses from individual animals may have the potential to cause injury. However, wildlife populations are usually affected only when a variety of factors work in combination to impact them, including declines or fluctuations in the availability of a food source, habitat destruction or alteration, predation, hunting, trapping, poaching, disease, or inclement weather, rather than noise alone. Normally it would be unrealistic to predict or attribute any wildlife population declines to a single stressor, such as noise. In addition, no published scientific evidence was identified that indicated harm may occur to wildlife as a result of exposure to the levels of noise generated by military aircraft that would utilize the airspace associated with the Hardwood Range.

Response to Comment No. 2

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 3

As described in Subsection 3.3.3.1 of the EIS, the Class A mishap rates reflected in the document consider the life-time operational use of the aircraft, under all conditions of flight. Therefore, any mishap occurring during any phase of flight is reflected in the statistic. As discussed in the EIS, risks associated with aircraft mishaps is low.

A complete discussion of Class A mishap rates is contained in Subsection 3.3.3.1 of the EIS. Tabulation of statistical projections for Class A mishaps for each aircraft using the airspace associated with this proposal is presented in Subsections 3.3.3.1 and 4.3.3 for current and proposed use conditions, respectively.

RESPONSES TO COMMENTS

Response to Comment No. 4

Effects to wildlife resulting from the proposed action may include habitat loss and noise, as discussed in Subsection 4.8 of this EIS. Some wildlife habitat would be disturbed as a result of the proposed range expansion, but adverse impacts to wildlife would be minimized by revegetating disturbed areas where practicable and locating range facilities to minimize habitat disturbance. Noise effects to wildlife in the vicinity of the proposed range expansion would be low. The best available information indicates that the effects of aircraft overflights on wildlife and livestock are generally short-term and minor, with no mechanism for long-term effects such as reduced reproduction, increased mortality, or habitat abandonment. Noise impact studies from a variety of military use areas were considered in the impact analysis process. Refer to Subsection 4.8.1.3 of this EIS for further discussion of noise impacts to wildlife.

Response to Comment No. 5

Subsection 4.10.2 of the EIS includes discussions of potential impacts on sensitive land use areas which underlie the airspace. These uses include the Sandhill Wildlife Area, Meadow Valley and the Necedah Wildlife Refuge Area, as well as other uses.

Response to Comment No. 6

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

RESPONSES TO COMMENTS

November 14, 1997

Col. Kent Adams, Program Manager,
Hardwood EIS
Air National Guard CEVP
3500 Fetchet Avenue
Andrews AFB, MD 20762-5157

Re: Data from Draft EIS on the Hardwood Range Expansion

Our Fellowship of Reconciliation chapter in Neenah, WI, has been studying this issue for two years. We have visited the bombing range, listened to several speakers, and most recently we have studied the Draft EIS.

It is inconceivable to me that the Air National Guard continues to push for expansion of the bombing range during peace time, over the objection of Wisconsin citizens. I am outraged that the negative impact of the range expansion on the environment is stated clearly in the EIS and then minimized in the summary.

Specifically, the EIS states that "increased soil erosion, change in drainage, change in flood water attenuation and storage" can be expected. (4.6.4 on p.4-29.) "Several endangered species will be threatened." See table 3-19 and 3-20 on pages 3-54,55.

Included in the EIS are letters from the Wood County Board of Supervisors objecting to your use of county forest intended for local recreational use. How dare you ignore the will of the citizens affected?

Included in the EIS is a letter from Ona Garvin, Ho Chunk Nation Legislator. She states that "the Air National Guard also needs to be aware of the fact that our traditional religious practices are being disrupted by the training... There are other sacred sites under this corridor... The Ho Chunk Nation remains opposed to the expansion of Hardwood Range into Wood County." I am furious that you have the arrogance to ignore the rights of these native Americans.

In conclusion, I find the evidence in the EIS to overwhelmingly indicate that the expansion of the Hardwood Range is immoral and possibly illegal.

Barbara Hoffman

Barbara Hoffman

1126 County Rd. JJ
Neenah, WI 54956

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 2

The Ho-Chunk and Menominee Tribes have been contacted and issues relevant to Native American concerns have been discussed. The Tribes have indicated that further consultation would be necessary should the ANG acquire the land. The ANG currently has a coordination system in place with the Ho-Chunk Nation that provides for a 5 NM avoidance area during any of their special observances or ceremonies. This system is on an "as called for" basis and is implemented by NOTAM and direct communication with daily users. Correspondence associated with those coordination initiatives are presented in Appendix O to the Final EIS.

NOV 14 1997

Written Comment Form

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

RESPONSES TO COMMENTS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Harlan Ledding

TITLE/ORGANIZATION: _____

ADDRESS: W7331 12Th. Ave. Necedah, WI. 54646

(Street)

(City/State/Zip)

- COMMENTS -

I am very much opposed to the expansion of the Hardwood Range for several reasons.

#1 As a property owner in the area, the noise level created by the low level flights is unbearably loud, and if the expansion does occur it will only get worse. This would have a detrimental effect on property values in the area.

#2 The loss of large tracts of county forest land will reduce our songbird, deer and other wildlife populations, which in turn will reduce tourism and the income derived from it, and will hurt the local economy further because of lost jobs in the timber industry.

#3 It is my understanding that there has never been a military range of this type that did not cause some type of pollution, and with the high water table in central Wisconsin the ground water may become contaminated.

#4 The cost of the proposed expansion would appear to be hard to justify. The purchase of over seven thousand acres, including cranberry acreage which would increase the cost substantially, and the installation of new target locations, drop zones and landing strip would cost the American taxpayer too much money, especially considering that the military, at the same time they want to expand this range, are closing other bases.

Please reconsider and do not expand this range.

Thank you,

Harlan Ledding

Please hand this form to the staff, drop into the collection box, or mail to:

Program Manager, Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fetchet Avenue
Andrews AFB, MD 20762-5157

Response to Comment No. 1

The question of aircraft overflights potentially affecting land values has been asked in many locations throughout the nation. In some locations, particularly around airports, documentation has been prepared that attempts to quantify the economic effect of aircraft overflights on land values. This documentation primarily deals with noise around airports in an urban setting. The variability of land value, due to diversity of location and improvements, has made it extremely difficult to quantify any potential difference that might be associated with overflights. Table 4-1 and Subsection 4.2.3 describe estimated noise increases at specific points around the range. No significant noise effects have been identified, however increases in noise would be noticeable at certain locations.

Response to Comment No. 2

Impacts on wildlife populations are addressed in Biological Resources (see Subsection 4.8.2.1). Text has been added in Socioeconomics (Subsection 4.12) and in Appendix I regarding potential effects on tourism and the timber industry.

Response to Comment No. 3

Potential sources of pollutants to surface and groundwater in the range expansion area are from aircraft mishaps (i.e. crashes) and from munitions. These sources and the fate of potential pollutants are discussed in Subsections 3.3.3.1 (Aircraft Mishaps), 3.3.4.1 (Munitions Use and Handling) and 3.4.1 (Hazardous Materials and Solid Waste). Potential impacts to both surface and groundwater resources and water quality are discussed in Subsections 4.6.2.1, 4.6.2.2 and 4.6.2.3. Based on the information provided in Section 3 of the EIS, adverse impacts to surface and groundwater quality or drinking water supplies would not be expected. The EIS test for Subsections 4.5.2.3 (Water Quality) was modified to reference the identified appropriate sections in Section 3 and discuss conclusions regarding groundwater quality.

Response to Comment No. 4

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

10710

Harlan

Ledding

504

November 15, 1997

RESPONSES TO COMMENTS

Program Manager
Hardware EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fetchet Avenue
Andrews AFB, MD 20762-51577

Dear Sir:

I am writing this to express my OPPOSITION to the expansion of the Hardwood Bombing Range.


Being a professional pilot, I am well aware of the vast amount of airspace and land already controlled by the armed services for training. I support training, but I strongly oppose additional land being added for this purpose. There are currently more than enough training areas available. In some parts of our country it is all but impossible to access civilian airports adjacent to these areas. The Hardwood range as it currently stands has created many serious conflicts with private and commercial aviation.

I do not believe the government should take peoples land from them without their consent, nor should the government install a facility in an area where public opposition is so strong. The government is supposed to be for the people not against them.

The expansion of the Hardwood range will have a very adverse affect on the surrounding area, it will remove badly needed recreational land, adversely effect wild life habitat, and destroy the dreams and livelihood of many landowners.

Use the existing training areas.

Sincerely,


Don Allen
436 Brentwood Drive
Wisconsin Rapids, WI 54494

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

505

1

RESPONSES TO COMMENTS

November 15, 1997

Program Manger
Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fetchet Avenue
Andrew AFB, MD 20762-5157

Dear Sir:

I am writing this to express my OPPOSITION to the expansion of the Hardwood Bombing Range.

The expansion is unnecessary. Use other existing ranges or bases or the 75,000 acres the government owns in Juneau County. From the figures I've read, an additional 7100 acres will not be enough for multiple approaches. If 22,400 acres is needed, and 7929 acres is being used now, by adding 7137 Wood County acres, the total is 15,066 acres. Therefore there is a shortage of 7334 acres. Now what? Take another 7334 acres from whom?

It is a waste of taxpayer's dollars to close some military facilities while spending more money to expand the range here, especially in light of a large amount of public opposition.

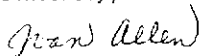
Consolidated Papers Inc. would not purchase timber from the range due to metal and other foreign object contamination. Losing 7137 acres is a big concern.

There will be an increase in noise to a larger area if the range is expanded.

Recreation lands will be lost and there will be an adverse environmental impact along with nesting problems for eagles, falcons, wolves, etc. The expansion could impact the Sandhill Wildlife area, Meadow Valley and Necedah Wildlife Refuge.

It appears for me: cost is high, benefit is low!

Sincerely,



Joan Allen
436 Brentwood Drive
Wisconsin Rapids, WI 54494

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

507

309 W. Upham
Marshfield, WI 54449

November 15, 1997

Program Manager, Hardwood EIS
Environmental Division
Air National Guard CEVP
3500 Fetchet Avenue
Andrews AFB, MD 20762-5157

Dear Program Manager:

We oppose the proposed expansion at the existing Hardwood Air-to-Ground Bombing Range by the Wisconsin Air National Guard, and hope that the Air National Guard will withdraw from this proposed course of action.

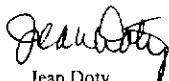
The expansion would create long-term environmental problems, and the noise from the increased bombing runs will negatively impact people nearby and along the flight routes. There are also several wildlife species in the area that are either threatened or endangered, and, reading the Air National Guard's Draft Environmental Impact Statement, it's clear that very little is known about the long-term impact to these species by the expansion.

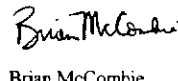
The expansion would take away 6,600 acres of Wood County Forest land from the citizens of Wisconsin. Thousands of people use this land every year for a host of recreational activities, and expansion of the range will mean a real loss for the people of Central Wisconsin.

Finally, we are worried that letting the Guard take county forest land will set a dangerous precedent. Such lands are meant for all Wisconsin citizens, yet this expansion into Wood County land could mean similar losses in the future, and it is impossible to replace these large, undeveloped tracts.

For these reasons, we hope the Air National Guard will withdraw its proposed expansion at the Hardwood Range.

Sincerely,


Jean Doty


Brian McCombie

RESPONSES TO COMMENTS

Response to Comment No. 1

The best available information indicates that the effects of aircraft overflights on wildlife and livestock are generally short-term and minor, with no mechanism for long-term effects such as reduced reproduction, increased mortality, or habitat abandonment. Noise impact studies from a variety of military use areas were considered in the impact analysis process. Refer to Subsection 4.8.1.3 of this EIS for further discussion of noise impacts to wildlife.

Response to Comment No. 2

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 3

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

RESPONSES TO COMMENTS

Rt. 1, Box 208A
Kendall, WI 54638

Nov. 15, 1997

Program Manager, Hardwood Range EIS
ANGRC/CEVP
3500 Fetchet Avenue
Andrews Air Force Base, MD 20762-5157

Dear Program Manager;

It is with sorrow and anger that I send this letter to oppose the draft environmental Impact Statement for the proposed Hardwood Range Expansion and Associated Airspace Actions.

The huge EIS is flawed in many ways and for me, a field biologist, the most glaring errors and omissions of which there are many, are concerned with up to date, biological surveys which are quite lacking. I work seasonally at a state park less than three miles from Volk Field Air National Guard Training site. The plants and animals of the area in Juneau County near Volk Field and the Hardwood range, as well as the area immediately north of the Range in Wood County, have been studied informally for many years. The draft EIS presents hear-say and out of date evidence of the flora and fauna of those above areas.. Much of the comment on the biological make-up of these lands are generalizations too broad to have meaning.

Aside from these questions, the whole concept of running training flights over flyways and inhabited areas is criminally wrong. I lived for many years in Delaware and Pennsylvania and question why you don't run these flights over the areas near Maryland?

The information given me at scoping meetings by Volk Field military personnel acknowledged the existence of many similar Gunnery Ranges on the seaboard perimeters of the United States. There is no need for another one here—even a civilian can understand that!

In Wisconsin there is a graver danger from many small militia groups ensconced in out of the way localities here, than anything. They are a danger to our democracy and could use terrorist weapons such as biological warfare and briefcase nuclear bombs. The Hardwood Range will do nothing against such real dangers. The same is true of terrorist groups outside of the country who are waiting as this is written to wage biological war or set off nuclear bombs in the U.S.A. The bombing range is not needed and serves no purpose except to give employment to some military personnel.

Sincerely,



Carol Richter

Response to Comment No. 1

The EIS makes use of the best available information regarding biological resources in the region. Sources of information included published reports, supplemental surveys, agency databases, and personal communication with land and wildlife managers. Additional information in the form of reports or unpublished data would be included in the EIS, if available.

Response to Comment No. 2

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 3

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

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RESPONSES TO COMMENTS

Citizens United Against Low Level Flights
Box 442
Viroqua, WI 54665
November 15, 1997

Air National Guard Readiness Center
Program Manager, Hardwood Range EIS
ANGRC/CEVP
3500 Fetchet Avenue
Andrews Air Force Base, Maryland 20762-5157

Dear Program Manager,

After careful reading of the draft environmental impact statement for the Hardwood Range expansion, the members of Citizens United Against Low Level Flights have concluded that the draft is full of conclusions unsupported by research. The Air National Guard concluded that "operational limitations" must end its plan to establish new MTR corridors over southern and southwestern Wisconsin. We of Citizens United Against Low Level Flights see as many or more operational limitations in your plan to expand the Hardwood Bombing Range, and believe you should withdraw your effort to gain approval for the expansion.

Some of our objections are as follows:

Accidents: Class A mishaps occur more frequently on take off and landing of aircraft. The addition of an airstrip in the expansion is likely to increase the number of Class A mishaps. This is not the conclusion listed on page 2-28 of the DEIS. Rather, the Guard claims that no alteration in Class A mishaps would occur. Cleanup of the physical environment should be an immediate priority. The conclusion on page 2-29 of the draft contradicts reality. The Guard in practice has not shown quick response to accidents. As an example, of which there are many, the hazardous materials from an F-16 crash at Strum, Wisconsin in 6-95 were not even contracted for cleanup until 3 months after the crash.

Airspace use and safety: According to page 1-10 of the draft, MOAs should be "hot" for no more than 8 hours at a time. Non-military pilots who need to traverse the MOAs can call a recorded message to check whether the MOA is hot or not. The fact is that the MOAs are hot longer than 8 hours periodically, that the recorded message is not reliable, that emergency medical flights have been denied access when it was needed, and that med flights and other non-military pilots have experienced near in-air tragedies with military aircraft using the MOAs. This is documented in Citizens United records. The draft does not admit this is a safety problem, and its research is vague.

Assessments: The Guard's reliance on the term "assessment" when

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 2

As described in Subsection 3.3.3.1 of the EIS, the Class A mishap rates reflected in the document consider the life-time operational use of the aircraft, under all conditions of flight. Therefore, any mishap occurring during any phase of flight is reflected in the statistic. As discussed in the EIS, risks associated with aircraft mishaps is low.

A complete discussion of Class A mishap rates is contained in Subsection 3.3.3.1 of the EIS. Tabulation of statistical projections for Class A mishaps for each aircraft using the airspace associated with this proposal is presented in Subsections 3.3.3.1 and 4.3.3 for current and proposed use conditions, respectively.

The initial response to an aircraft accident focuses on rescue, evacuation, fire suppression, safety, and elimination of explosive devices, ensuring security of the area, and other actions immediately necessary to prevent loss of life or further property damage. Subsequently, the investigation phase is accomplished.

If an aircraft accident occurs on non-federal property, regardless of the agency initially responding to the situation, as soon as the situation is stabilized, a National Defense Area will normally be established around the accident scene, and the site will be secured for the investigation phase.

As soon as possible after all required investigative actions on the site are complete, the aircraft will be removed, and the base civil engineer will accomplish clean-up of the site, or will have a contract to an outside agency to accomplish the clean-up.

In the event of an aircraft mishap, the ANG puts the highest priority on human health and safety and any immediate threat to the environment. The ANG also takes complete responsibility for cleanup of all sites by working in close coordination with a wide range of Federal, state, and local officials.

RESPONSES TO COMMENTS

referring to the number of flights over the area must be clarified in the final EIS. We are not confident that "assessment" is an accurate term, nor that the assessments made are a reliable way to determine the flights' impact on the environment, in light of the fact that the present number of flights in MOA Falls One and Two are 6 and 8 times higher than were previously approved.

Contamination/toxicity: The draft states that the area of the expansion consists of wetlands. The draft then concludes on page 4-27 that the activities associated with the range expansion would not have an impact on groundwater. We find this impossible to believe since there is already water on the site which the draft admits is contaminated with toxins. This site is not even being monitored according to the draft. The activities for which the range is used cause the dispersal over or into the earth of chaff (aluminum coated fiberglass), carbon monoxide, methane, benzene, 2,4 dinitrotoluene, 2,6 dinitrotoluene, nitrogen oxide, lead, cadmium and titanium tetrachloride. These chemicals, which are known toxins and/or carcinogens, will leach into the groundwater, which cannot be kept separate from the wetland being used for practice. The draft includes no reliable scientific data to show otherwise.

Costs: There is no indication in the draft (pages 2-5, 2-7, 2-17) when costs of the expansion and related actions are discussed, that there is a reliable figure arrived at through recognizable accounting procedure which makes it believable that the expansion would be a cost cutter. We highly doubt this. The draft indicates that only one of the units scheduled to use the expanded range is located within 100 miles of it, that 2 would save minuscule mileage, and that 2 would actually increase the mileage traveled from home to the range. If it is true, as we believe, that the figures are unclear or unavailable, then the draft cannot sustain its claim that cost cutting is a factor supporting the alleged need for expansion.

Department of Natural Resources, Fish & Wildlife concerns: What are the results of the coordination of study of the environmental impacts of the plan between the ANG, the DNR and USFWS? If you're trying to find out from the draft EIS, good luck. We request that this information, which must answer all of the concerns listed by those agencies, be gathered, compiled and included in the final EIS. The DNR and the USFWS each has listed specific concerns which have yet to be addressed. What is an environmental impact statement if the concerns of the agencies that best assess the impact to environment of a 7000 acre expansion of a bombing range and its related activities remain unanswered? A miscarriage of law.

Flight simulators as a viable alternative: The United States Air Force and the airline industry use flight simulators to train their pilots. In fact, the airline industry considers this the most

Response to Comment No. 3

The proposed range expansion is not anticipated to have an adverse impact on "Spirit of Marshfield" helicopter medevac operations. The Marshfield Base Manager has an agreement with Volk Field personnel which includes procedures to ensure that military flight operations will be curtailed, if necessary, to ensure that "Spirit of Marshfield" flights with patients will have direct, unimpeded access to their destination. In addition, Minneapolis Air Route Traffic Control Center personnel assign the necessary priority to "Spirit of Marshfield" flights to ensure direct light routing. The Marshfield Base Manager has also established an excellent working relationship with Volk Field personnel to ensure that problems are resolved as they are identified.

Response to Comment No. 4

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 5

It is unlikely that chaff and spotting charges would cause an impact to wetlands or cause groundwater contamination. Chaff and spotting charges which could contain small amounts of gunpowder and titanium tetrachloride are used on the range. However, the extremely small quantities of such elements contained in these components, or which are by-products resulting from use of the components, are in quantities below levels that would ever be considered harmful to persons, animals, or the environment.

RESPONSES TO COMMENTS

Response to Comment No. 6

If units currently using the Hardwood Range were required to deploy to another range to receive the required training, jet fuel and related training costs associated with temporary movement of personnel and aircraft would increase costs significantly.

Response to Comment No. 7

Coordination with the Wisconsin DNR and the USFWS began with the scoping process and will continue after the completion of the EIS process should a decision be made to proceed with the proposal. Because all of these activities will not be completed prior to the completion of the EIS, providing a compilation of all these activities is impossible. Where issues have been resolved, that information is reported in the Final EIS.

RESPONSES TO COMMENTS

effective and safe way to train. It is also the most cost effective. Recent computer technology allows a remarkable degree of realism in flight simulation. Why has the ANG disregarded this recognized alternative? The NEPA process requires that viable alternatives be fully considered. The ANG did not do this. This invalidates the draft EIS. Further consideration of this type of training is advisable, if the ANG is really searching for cost effective training methods.

Fort McCoy: "The unobligated availability of Fort McCoy cannot meet ANG requirements" according to the draft, page 2-15. However, there is no data in the draft indicating how this conclusion was determined. How often is Fort McCoy unavailable? Have alternative management plans for Fort McCoy and for ANG training time been fully examined? The final EIS must provide the information which led the ANG to this conclusion of unavailability.

Ho Chunk Nation: The Ho Chunk Nation passed a resolution opposing the range expansion. The ANG has stated through General Slack that a guarantee of no flyovers at the Ho Chunk daycare, senior citizen center and casino can be made by the ANG. In pages 4-51 to 4-55 of the DEIS, there is no resolution regarding this. Also there is no indication of whether or when assessments of the land area to be bombed will be made to determine presence of sites or artifacts of archaeological significance.

Jobs: The draft refers on page 3-90 to the 197 persons employed by Volk Field. This should not be a consideration in a land use issue of such profound impact. But if the ANG is considering the provision of jobs as a factor in its decision making, then it must provide data as to how many persons will lose jobs or lose opportunities for jobs if 7000 acres is converted from cranberry production, farming, forestry and recreational use to a bombing range.

Land exchange: The final EIS should make clear the environmental impact of turning 7000 acres of Wisconsin recreational, forest and wetland into a bombing range. Replacing this large tract of land with small and separated parcels is not environmentally equivalent. The final EIS should make clear that there will be distinct losses to quality conditions for wildlife, plant life and air and water quality if the range is expanded.

Livestock: Page 2-30 of the draft says that livestock in the area of the existing range is unaffected by range activity because of habituation. What about livestock in the many areas which will be affected by the expansion? Surely the claim of habituation cannot be used to dismiss this problem. Several hundred letters from persons commenting on the planned expansion were not included in the draft. How many of those complained of livestock stresses from flyovers or other range activities? The public is not informed by the draft. These letters are not included in the appendix.

Response to Comment No. 8

The use of flight simulators for pilot training is already part of the training program for various aircraft using the affected airspace. The F-16 training regulation (AFI 11-F16) stipulates those activities that may be accomplished using simulators and those requiring actual flying. Although flight simulators work well for certain types of training (e.g., emergency procedures and instrument training), the complete substitution of simulator training for all flight training is not a viable alternative. In addition, the availability of simulators for on-going readiness training is limited.

Response to Comment No. 9

Records of requested use and non-availability of Fort McCoy are currently not being kept. However, past experience and knowledge of activities at Fort McCoy indicates that little time would be available for military aircraft training.

Response to Comment No. 10

The Ho-Chunk and Menominee Tribes have been contacted and issues relevant to Native American concerns have been discussed. The Tribes have indicated that further consultation would be necessary should the ANG acquire the land. The ANG currently has a coordination system in place with the Ho-Chunk Nation that provides for a 5 NM avoidance area during any of their special observances or ceremonies. This system is on an "as called for" basis and is implemented by NOTAM and direct communication with daily users. Correspondence associated with those coordination initiatives are presented in Appendix O to the Final EIS.

Response to Comment No. 11

Volk Field employment data has been provided as part of the baseline economic data for existing conditions. Additional data has been incorporated into Subsection 4.12 and in Appendix I regarding estimated earnings from forestry-related manufacturing as well as the number of acres of agricultural lands in the range expansion area. Recreation and tourism effects are discussed qualitatively since data are not available on numbers of recreational users and tourists using the County Forest Land and other lands in the range expansion area.

Response to Comment No. 12

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

RESPONSES TO COMMENTS

Citizens United Against Low Level Flight has received numerous reports from livestock owners and veterinarians which indicate livestock is stressed greatly by jet noise. Additionally, the ANG should try to prove that it has an effective way of gathering complaints from citizens who experience livestock problems from flyovers and other range noise. If no effective complaint process exists, then the ANG cannot know what problems citizens have experienced from range activity.

14

MTRs: In the draft, tables and pages 2-5, 2-16, 2-17 and S-2 show that Volk South MOA was established with the intention of adding 2 new military training routes over geographical areas west and south/southwest of the range. Since the part of the plan which would have established those 2 MTRs has been dropped by the ANG due to "operational limitations", it is no longer feasible to expand the range as planned. The units which would have used the new MTRs can no longer economically use the range, since they cannot access it directly. We expect the final EIS to address the question of why a range expansion which needs new MTRs to be feasible and sensible, but which cannot have them, should be pursued by the ANG anyway.

15

Noise: The draft's conclusions regarding noise impact from the range expansion are based on little or no research, and erroneous assumptions about topography, weather conditions and population. The ANG used an outdated and flawed model, NOISEMAP, for its conclusions, rather than using the ASAN model. NEPA requires that an impact be studied before a conclusion is considered valid. Assumptions do not validate a study. We expect that real information retrieved from an actual study of noise effects in the area of the range, which would include extensive surveying of citizens in the area, will be completed and included in the final EIS.

16

Populated areas: The draft (page 2-5) calls the area north of the range "sparsely inhabited". What does this mean? The draft does not indicate that the ANG has determined how many people live around the range, and around the area of the expansion. How many people residing in the area of the range are adversely affected by the range activities? The final EIS should include data indicating population, and data indicating what level of satisfaction that population has with present range activities. What is the impact of range-related noise on a population accustomed to peace and quiet? That is the question which must be examined, not whether or not enough individuals live in the area for the ANG to consider it "populated."

17

Present facilities: The DEIS should not use the existence of present facilities at the range in an effort to justify the expansion, which is what the draft attempts on page 1-3. An expansion of this nature must be studied and decided on its own merits, according to NEPA guidelines.

18

Response to Comment No. 13

The best available information indicates that the effects of aircraft overflights on wildlife and livestock are generally short-term and minor, with no mechanism for long-term effects such as reduced reproduction, increased mortality, or habitat abandonment. Noise impact studies from a variety of military use areas were considered in the impact analysis process. Refer to Subsection 4.8.1.3 of this EIS for further discussion of noise impacts to wildlife.

Response to Comment No. 14

Potential noise effects on humans, animals, and structures are discussed in Appendix F of the EIS. Also, see response to Comment No. 13, above.

Response to Comment No. 15

The Volk South MOA was not established with the intention of adding new MTRs. Expansion of the range to provide multidirectional approach routes for use by training aircraft remains a viable need regardless of the suitability of additional MTRs from the south or west.

Response to Comment No. 16

The Assessment System for Aircraft Noise (ASAN) model and the MR_NMAP model (which was used for this assessment) base all of their calculations on the Air Force's NOISEMAP technology. The basic algorithms used in both programs are similar to those used in the ROUTEMAP model which was designed specifically to model noise on military training routes. Therefore, while ASAN does have expanded data reporting potential, basic noise level calculations are similar.

The procedures used to determine aircraft noise exposure and its results represent the best available technology. All aircraft operations presently occurring, and proposed to occur were considered. Noise was computed using the Air Force's MR_NMAP software, which bases its calculations on the same physical principles used for aircraft noise analysis throughout the world, and was specifically validated for military airspace operations. Data incorporated into the Air Force's noise models are widely accepted by the scientific community, and the Air Force regularly participates in various scientific organizations to ensure that the best available data and methods are used.

RESPONSES TO COMMENTS**Response to Comment No. 17**

The sparsely inhabited area referred to on page 2-5 refers to the area considered for the range expansion. Details on land ownership and population density have been examined in a study prepared specifically for this EIS (see Appendix I, Socioeconomics). This study was presented in draft in the Draft EIS while the study was being reviewed by representatives of Wood County. The final version of this study is included in this Final EIS. The noise section of the EIS (Subsection 4.2) has addressed range operations related noise impacts.

Response to Comment No. 18

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

RESPONSES TO COMMENTS

Wetlands: Page 4-27 of the draft states that the federal government must avoid new construction in wetlands unless no practicable alternatives exist. It is impossible to argue that the wetlands in the 7000 acre expansion area would not be severely and adversely affected by construction, then year after year of bombing and other range-related activity. The ANG would be hard-pressed to show that it has truly taken into consideration all viable alternatives to destroying this wetland. The final draft should adequately address this problem.

19

Wildlife: The draft relies on incomplete studies to conclude that little or no significant impact upon wildlife will occur with the expansion. The Ellis study cited on page 4-41 did not follow birds into subsequent years as jet traffic increased, and did not study the behavior of birds which were not already habituated to aircraft noise levels. Page 2-30 contradicts the DNR's view that a range expansion will negatively affect efforts to restore wolves to the area. The draft's claim that flights will avoid sensitive wildlife areas is not believable. The entire area of the expansion is teeming with wildlife. How will the many species of animals which live in the 7000 acres be unaffected once the bombing and other range-related activities destroy the habitat?

20

We expect that a final EIS will not be published until all of these questions raised are properly researched and truthfully answered, as you are directed to do by the NEPA process. Thank you.

Sincerely,

Susanne Ripple

Susanne Ripple, President, and all members of Citizens United Against Low Level Flights.

cc. Major General James G. Blaney
Governor Tommy Thompson
Senator Russ Feingold
Senator Herbert Kohl
Representative Ron Kind

Response to Comment No. 19

The ANG firmly commits to not impact wetlands in development of the proposed expansion area; however, Executive Order 11990 which calls for "no net loss of wetlands" does not preclude the development of projects within a wetland as long as no practicable alternatives exist and that the proposal includes all practicable measures to avoid wetlands impacts. Assuming the expansion is approved, the proponent would be required to obtain an individual Clean Water Act Section 404 permit for any activities occurring within wetlands or other waters of the United States. Issuance of a Section 404 permit requires a demonstration that the Section 404 (b)(1) Guidelines have been followed. The Guidelines require that the project avoids and minimizes impacts to wetlands to the extent possible and provide mitigation for unavoidable impacts. Once specific designs and locations for the landing zone, drop zone, and target area(s) are available, the ANG will conduct jurisdictional wetland delineations to facilitate the assessment of specific project components (and alternatives) on wetland resources, as applicable. Subsection 4.6.2.4 of the EIS discusses requirements under Executive Order 11990, Protection of Wetlands, Section 404 of the Clean Water Act, and Chapter NR 299 of the Wisconsin Administrative Code.

RESPONSES TO COMMENTS

Response to Comment No. 20

Subsection 4.8.1 of this EIS discusses noise impacts to wildlife. There is evidence in the scientific literature that startle or panic responses to noise do occur in some wildlife species. However, existing studies suggest that these short-term responses do not result in long-term population impacts. A study conducted in North Carolina concluded that “the low response rate of waterfowl behaviors to the presence of aircraft in this study suggested that waterfowl either did not perceive the aircraft as a stressor, or that they became habituated to the presence of aircraft due to repeated exposures over time” (Fleming et al. 1996). Also, the same study found that nesting rates, nesting success, the number of eggs laid, the number of eggs hatched, and nest desertion rates were the same in areas with aircraft overflights and areas without aircraft overflights. However, the study did find that duckling exposed to airport-related aircraft noise grew slower and weighed 4.6 percent less than ducklings not exposed to noise. The existing noise levels and any changes in noise should the proposal be implemented, do not result in the levels of noise related to airport activity. As reported in the study conducted by Ellis et al. 1991, low-level overflights and mid- to high-altitude sonic booms did not have long-term adverse impacts to nesting raptors (refer to Subsection 4.8.1.3). This was a two-year study, involving a high frequency of aircraft overflights.

For species that may not reuse nesting sites or have multiple roosting or nesting sites, avoidance of known bird concentration areas may not be feasible. However, as discussed above and in Subsection 4.8.1.3 of the EIS, intermittent overflights of bird nesting or roosting areas are unlikely to result in long-term adverse impacts to raptors, waterfowl, or other birds.

The USFWS expressed concern that the development of ground-based facilities in the expansion area could potentially result in adverse effects to the gray wolf, but emphasized that insufficient data are currently available to make a determination. The EIS states that potential impacts to wildlife (including the gray wolf) would exist, but would generally be low with the implementation of specific mitigation measures.

Nov. 15, 1997

RESPONSES TO COMMENTS

Air National Guard Readiness Center
Program Manager, Hardwood EIS
ANGRC/CEVP
3500 Fetchet Ave.
Andrews Air Force Base, MD 20762-5157

Sir:

This is in response to the DEIS on the proposed expansion of the Hardwood Bombing Range and related airspace.

We strongly feel that the DEIS has seriously skirted particular environmental issues and concerns and has not even basically explained specific concerns. Many of the "consultations are ongoing", making it impossible for we concerned Wisconsin property owners to assess the real impact on our quality of life and of the overall impact projected on the greater environment.

As a professional naturalist, I know that the "circle of life" means that everything in this world impacts on something else within the circle chain, from minute to grand scale.

To say in the DEIS that there will be no "significant impact" on the environment--people and wildlife populations--is beyond my comprehension. IT NEEDS TO BE SPECIFICALLY ADDRESSED AND SCIENTIFICALLY, AND ADEQUATELY RESEARCHED, BY PROFESSIONALS IN THE FIELD!

Noise pollution, toxic waste/materials and detrimental effects on wildlife populations --now and future-- must be researched over longer periods than in the limited "studies" mentioned in the DEIS.

We strongly request that the issues mentioned above be addressed in the final EIS, and that we are made fully aware of the methods and agencies conducting such environmental research.

While we spend part of our time between Illinois and Wisconsin, Wisconsin is in particular need of protecting the last bit of wildness. Hardwood Range Expansion would jeopardize the surrounding environment--and beyond-- for years to come.

It must be thoroughly researched, assessed and documented in the final EIS.

Sincerely,

Ken Stark
Chris Stark

Chris and Ken Stark, 233 N. 2750E Rd., Kankakee, ILL. 60901-8021

Response to Comment No.1

Comment noted [see Section 6 in Volume I concerning incorporation of public comments].

113140

Ken

Stark

3511 2nd Str. S.
Wisconsin Rapids WI 544
Nov. 16, 1997

RESPONSES TO COMMENTS

Program Manager Harwood EIS Environmental Division
Air National Guard Readiness Ctr./CEUP
3500 Fetchet Ave.
Andrews AFB
Maryland 20762-5157

Dear Program Manager,

After reading several newspaper articles and
conversing with others in regards to the possible
expansion of the Harwood Bombing Range,
518 I feel that it is necessary to express my
opposition to this project. After weighing
all the advantages and disadvantages, it
just does not sound like the sensible
thing to do.

Respectfully Yours,
Heidi S. Gross

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

3731 Coach Lantern Drive
Wisconsin Rapids, WI 54494
November 16, 1997

Mr. Paul Westegaard
Wood County Parks and Forestry
Courthouse
400 Market St.
P. O. Box 8095
Wisconsin Rapids, WI 54495-8095

Subject: Opposition to Proposed Hardwood Range Expansion

Dear Mr. Westegaard:

I write to oppose the proposed expansion of the Hardwood Bombing Range due to the following negative environmental impacts:

1. The noise will harm Ho-Chunk tribal and other elders and children living nearby.

2. The noise will harm wildlife in the area, especially potentially the grey or timber wolf, which recently has been moving back into the area a few miles northwest of the proposed expansion.

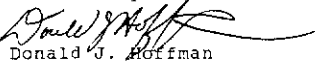
3. The noise significantly reduces the peacefulness in the area that draws both residents and tourists driving people away and causing economic harm as well.

4. The noise and increased risk of accidents will damage the businesses of the nearby Rainbow Casino and cranberry growers, both important to residents and tourists.

5. The removal of access to thousands of acres of forest land from public recreation significantly will reduce the quality of life socially and economically for residents and tourists--there are no comparable even marginally contiguous replacement forest lands available.

In sum, this is a project that strongly negatively would affect our citizens and visitors.

Yours truly,


Donald J. Hoffman

cc: U.S. Senator Herb Kohl
U.S. Senator Russ Feingold
U.S. Representative David Obey
Program Manager, Hardwood EIS

RESPONSES TO COMMENTS

Response to Comment No. 1

The Ho-Chunk and Menominee Tribes have been contacted and issues relevant to Native American concerns have been discussed. The Tribes have indicated that further consultation would be necessary should the ANG acquire the land. The ANG currently has a coordination system in place with the Ho-Chunk Nation that provides for a 5 NM avoidance area during any of their special observances or ceremonies. This system is on an "as called for" basis and is implemented by NOTAM and direct communication with daily users. Correspondence associated with those coordination initiatives are presented in Appendix O to the Final EIS.

Response to Comment No. 2

The best available information indicates that the effects of aircraft overflights on wildlife and livestock are generally short-term and minor, with no mechanism for long-term effects such as reduced reproduction, increased mortality, or habitat abandonment. Noise impact studies from a variety of military use areas were considered in the impact analysis process. Refer to Subsection 4.8.1.3 of this EIS for further discussion of noise impacts to wildlife.

Response to Comment No. 3

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 4

As described in Subsection 3.3.3.1 of the EIS, the Class A mishap rates reflected in the document consider the life-time operational use of the aircraft, under all conditions of flight. Therefore, any mishap occurring during any phase of flight is reflected in the statistic. As discussed in the EIS, risks associated with aircraft mishaps is low.

A complete discussion of Class A mishap rates is contained in Subsection 3.3.3.1 of the EIS. Tabulation of statistical projections for Class A mishaps for each aircraft using the airspace associated with this proposal is presented in Subsections 3.3.3.1 and 4.3.3 for current and proposed use conditions, respectively.

RESPONSES TO COMMENTS**Response to Comment No. 5**

As of this publication, the Air National Guard has not received any proposals that could be construed as an approach to provide alternate lands that could replace lands lost if the Department of Defense approves the range acquisition, as outlined in Section 1. If the acquisition occurs, it is anticipated that a majority of the forest lands and agricultural uses would remain as they exist today. If the Department of Defense approves the acquisition, depending on how it is accomplished (i.e., fee simple purchase, leasing from owners or the State, license, etc.), replacement lands would be an action that the State of Wisconsin or Wood County could address, as appropriate.

1111 Whitrock Avenue
 Wisconsin Rapids, WI 54494
 November 16, 1997

Program Manager, Hardwood EIS
 Environmental Division
 Air National Guard Readiness Center/CEVP
 3500 Fetchet Avenue
 Andrews AFB, MD 20762-5157

Dear Sir:

We are again writing to register our objection to the proposed expansion of the Hardwood Bombing Range. We do not believe the center of the State of Wisconsin is the proper place for this proposed bombing range. We understand and applaud the need for a strong and well-prepared military and our objection is not meant to negate that need. However, with all the military bases that have been closed or are being closed, it would seem there could be some location that might serve the same purpose without the disruption to so many citizens lives and homes as is apparently going to be the case if the Hardwood Range is expanded.

This is a beautiful and well used area that should not be used for your purpose and left desolate and despoiled. The environment has become a "hot" issue and this large tract of mostly natural forest land should be left for future generations to enjoy.

We again ask that you reconsider and find some other less used area for your training grounds where the effect on people and animals will be minimal. Thank you for your consideration of our concerns.

Sincerely,

Lois McMahon *Robert McMahon*

Robert & Lois McMahon

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

RESPONSES TO COMMENTS

50% Creamery Rd.
Pekossee, Ark.
Nov. 16, 1997

Dear Sirs:

I am writing in regard to the proposed expansion of the Hardwood Bombing Range in Wood County. As a child I can remember watching from our farm, as the jets from Fort McCoy practiced their bombing and strafing maneuvers. My own children, often spent afternoons counting "sonic booms". The area, however, has changed considerably since that time. What was once small family farms and forest-crop land is no more. The Township of Port Edwards is one of the fastest growing in Wood County.

Given these factors, I believe it is hard to justify

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

RESPONSES TO COMMENTS

expansion of the bombing range.
It seems much more sensible
to expand to the south/south-
west in Gila County, onto
land that is already owned
by the Federal Government.

-2

Thank you for your time
and consideration. I hope
that you will take this
information into account before
making a final decision.

Sincerely,
Linda O'Donnell

Response to Comment No.2

The Air National Guard has no jurisdiction to acquire lands presently under the administration of another Federal agency. Lands such as the Necedah National Wildlife Refuge already have a specific mission in their own right and therefore represent an extremely undesirable alternative to fulfill the need expressed by the Proposed Action.

RESPONSES TO COMMENTS

Response to Comment No. 1

Although range operations would close public access to many areas during training activities, hunting would continue to be an important part of the general plan for management of the range. Control of certain animal populations may depend on public activities on the range property.

Response to Comment No. 2

Effects to wildlife resulting from the proposed action may include habitat loss and noise, as discussed in Subsection 4.8 of this EIS. Some wildlife habitat would be disturbed as a result of the proposed range expansion, but adverse impacts to wildlife would be minimized by revegetating disturbed areas where practicable and locating range facilities to minimize habitat disturbance. Noise effects to wildlife in the vicinity of the proposed range expansion would be low. The best available information indicates that the effects of aircraft overflights on wildlife and livestock are generally short-term and minor, with no mechanism for long-term effects such as reduced reproduction, increased mortality, or habitat abandonment. Noise impact studies from a variety of military use areas were considered in the impact analysis process. Refer to Subsection 4.8.1.3 of this EIS for further discussion of noise impacts to wildlife.

Response to Comment No. 3

Similar to the existing range, timber harvesting would likely take place on the expanded range.

Nov. 17, 1997

Ben Behn
1732 Main St.
St. Point, WI 54486

Air National Guard Readiness Center
Program Manager, Hardwood Range EIS
ANGRC/CEVP
3500 Fitch Ave.
Andrews Air Force Base, MD 20762-5157

Dear ANG:

I am writing this letter in opposition to the proposed expansion of the Hardwood Bombing Range. There are several reasons I oppose this action, the first of which is the loss of recreational opportunity in the county forest. People will no longer be able to use the area for things like hunting and hiking. There are ecological reasons I oppose this as well. I believe the operations in the area will have a negative impact on several endangered species in the area such as the timber wolf and lynx. Part of the natural habitat will be destroyed by clear cutting for drop zones and landing areas. There are economic reasons to oppose the range also. Wood County should not have to lose \$42,000 annually and timber companies should not have to lose the right to harvest part of the county forest. In general, I feel there will be an overall decline of life in the area if you choose to expand the range. Why in an era of decreased military spending are you pushing this unneeded expansion in an area with so much opposition?

Sincerely,
Ben Behn

1507 Rutledge Street
Madison, Wisconsin 53703
November 17, 1997

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Program Manager Hardwood EIS
3500 Fetchet
Andrews AFB, MD 20762-5157

To Whom it May Concern:

I am writing to express my strong opposition to the expansion of the Air National Guard Bombing Range in the Wood County Forest. The expansion of the current bombing range is a destructive waste of natural resources.

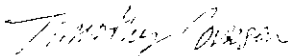
To suggest that the natural environment will not be adversely affected as has been put forward in the environmental impact statement prepared by the Air National Guard is not only completely absurd but is also outright deception and deceit.

The Wood County Forest is a beautiful natural habitat to many species of wild animals that will be devastated and destroyed by the bombs that will be dropped on the area. The quality of life and health of the residents of the surrounding communities will be greatly diminished and harmed by the activities carried out by the Air National Guard during their practice exercises.

Wisconsin's forests and farms are our greatest natural resource to destroy them in such a senseless way must not be allowed. In the post "Cold War" era we as citizens of this great nation must redirect our energies to create a future without the weapons of war; a future that nourishes and builds on the precious resources that we have, not a future based on aggression and devastation.

The bombing range must not be expanded. To allow this to happen would be a huge tragic mistake with long term consequences and costs that far out weigh any of the insignificant short term gains.

Sincerely,



Timothy W. Coursen
(608) 257-1119

cc: Sen. H. Kohl
Sen. R. Feingold

Written Comment Form

NOV 17 1997

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Stephen A. Ertz

TITLE/ORGANIZATION: _____

ADDRESS: 941 Wylie St. Wis. Rapids, WI. 54494
(Street) (City/State/Zip)

- COMMENTS -

I think the Air Force has done a wonderful job with the Bombing Range. I hunt the area for both small game & Deer. The use of the area for a range has in fact improved the quality of hunting in this section of woods. I would like to see the Range expanded beyond what is asked for operation. So little quality hunting land is left and for us in the public. And it is disappearing too fast. At the Range land will still be available to us.

I'm tired of the whining by people who are going to lose their rights to government leased lands, that they are losing for little or nothing and making a huge profit on.

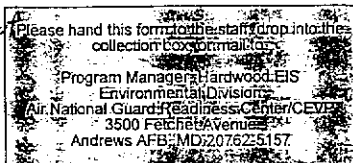
I've been around the areas & inspect during what the environmentalists say it is affecting the game, and they are full of it. These whatever you want to call them are only back smart not field wise.

The ones affecting the environment the most are crying the most. Cranberry growers. Time to level the playing field & give the power back to the majority not the minority.

The Range guards the land and we accitizens and hunters of the area need this expansion.

Thank you

Come see the no. 1 people watching the show when practice is on.



has always been very cooperative & helpful.

I have never had any problems on using the land for hunting. The staff there

RESPONSES TO COMMENTS

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

RESPONSES TO COMMENTS

November 17, 1997

Program Manager, Hardwood EIS
Environmental Division
Air National Guard CEVP
3500 Fetchet Avenue
Andrews AFB, MD 20762-5157

Program Manager,

Upon reviewing the DEIS I have the following comments on several issues I feel were not adequately addressed:

The assessment for the number of aircraft that will use the range is inaccurate. The actual flights exceed the assessment, therefore, how can the public be sure how many flights will be using the range? It's fact that foreign pilots train at Hardwood, why aren't the number of foreign flights mentioned? Are these flights included in the current assessment or are these flights in addition to the assessed number?

"Unavoidable adverse impacts to water resources are anticipated to occur as a result of the Hardwood Range expansion" is unacceptable. Further studies are required. The DNR and USFWS have raised questions on the wetlands issue and these concerns must be addressed.

Studies are inconclusive on contaminants and toxic materials. The Nevada Division of Environmental Protection claims studies on the use of chaff are inadequate. Why hasn't more research been done on effects to humans and animals where chaff is currently being used? The fibers in chaff are asbestos-like and could have serious health impacts on humans. The fact remains that asbestos has been banned, shouldn't more research occur on the use of chaff for the same reasons asbestos was banned? Why hasn't more research been done on potential environmental, ecological and health impacts of using chaff on public, private, and tribal lands and included in the DEIS? Studies must be completed on effects chaff would have on the wetlands.

Response to Comment No. 1

Historical range usage is shown on Table 2-6 in the EIS. This number has been less than the assessed value for the range since 1990. Foreign flights are not specifically identified but have been counted under "other" fighter or bomber aircraft that may use the range.

RESPONSES TO COMMENTS

Response to Comment No. 2

Subsection 4.6.2 discusses potential impacts that could occur to both surface and groundwater resources. Construction activities and use of the target complex, landing zone, and drop zone could impact drainage patterns within the range expansion area because small diversions or drainages may need to be developed to route drainage around facilities. Localized changes in drainage patterns or routing drainage would not use water and would not affect water quantity in the region. Subsection 4.5.2.3 indicates that use of the tactical target complex and construction activities could increase soil erosion in localized areas, potentially causing impacts to water quality. These impacts would be mitigated and managed through the use of Best Management Practices (BMPs) to stabilize and minimize soil movement at the areas of disturbance. Potential sources of pollutants to surface and groundwater in the range expansion area are from aircraft mishaps (i.e. crashes) and from munitions. These sources and the fate of potential pollutants are discussed in Subsection 3.3.3.1 (Aircraft Mishaps), Subsection 3.3.4.1 (Munitions Use and Handling), and Subsection 3.4.1 (Hazardous Materials and Solid Waste). Based on this information adverse impacts to surface and groundwater quality or drinking water supplies would not be expected. Subsections 4.5.2.3 (Water Quality) were modified to reference the appropriate subsections in Section 3, and discuss conclusions regarding water quality.

The ANG firmly commits to not impact wetlands in development of the proposed expansion area; however, Executive Order 11990 which calls for "no net loss of wetlands" does not preclude the development of projects within a wetland as long as no practicable alternatives exist and that the proposal includes all practicable measures to avoid wetlands impacts. Assuming the expansion is approved, the proponent would be required to obtain an individual Clean Water Act Section 404 permit for any activities occurring within wetlands or other waters of the United States. Issuance of a Section 404 permit requires a demonstration that the Section 404 (b)(1) Guidelines have been followed. The Guidelines require that the project avoids and minimizes impacts to wetlands to the extent possible and provide mitigation for unavoidable impacts. Once specific designs and locations for the landing zone, drop zone, and target area(s) are available, the ANG will conduct jurisdictional wetland delineations to facilitate the assessment of specific project components (and alternatives) on wetland resources, as applicable. Subsection 4.6.2.4 of the EIS discusses requirements under Executive Order

RESPONSES TO COMMENTS

11990, Protection of Wetlands, Section 404 of the Clean Water Act, and Chapter NR 299 of the Wisconsin Administrative Code.

Response to Comment No. 3

Chaff consists of very small fibers of aluminum-coated mica that reflect radar signals and, when dispensed from an aircraft, form a cloud that temporarily hides the aircraft from radar detection. Although the chaff may be ejected from an aircraft using a small pyrotechnic charge, the chaff itself is not explosive. Chaff is composed of silicon dioxide fibers ranging in diameter from 0.7 to 1 mil (thousandth of an inch), coated by an aluminum alloy and a slip coating of stearic acid (fat). Analyses of the materials comprising chaff indicate that they are generally non-toxic in the quantities used. Silicon dioxide is an abundant compound in nature that is prevalent in soils, rocks, and sands. The trace quantities of metals included in the mica fibers are not present in sufficient quantities to pose a health risk. Aluminum is one of the most abundant metals in the earth's crust, water, and air. In general, aluminum is regarded as non-toxic. Trace quantities of silicon, iron, copper, manganese, magnesium, zinc, vanadium, or titanium may be found in the alloy. The quantities involved are a minuscule percentage of levels that might cause concern. Stearic acid is found naturally as a glyceride in animal fat and some vegetable oils. Chaff has also been test-fired in a controlled environment to determine its potential to break down into respirable particulates, and the findings of the test detected no such result. The potential for chaff to affect soil and water is remote. Laboratory tests of chaff, using a modified toxic characteristics leaching procedure, indicated little or no potential for adverse effects on soil. No adverse impacts on biological resources have been identified. Based on their digestive processes, few animals are expected to suffer physical effects from chaff ingestion. Effects from inhalation are not considered a significant issue, since chaff particles would represent a small percentage of the particulates regularly inhaled by animals. Impacts on land use and visual resources are directly related to the visibility and accumulation of chaff debris. Field studies of the visibility of chaff and incidental debris in different environmental contexts concluded that significant aesthetic effects are unlikely.

RESPONSES TO COMMENTS

Response to Comment No. 4

The "cold spot" spotting charge used to aid scoring accuracy of training ordnance contains approximately 17 cubic centimeters (cc) of titanium tetrachloride. When exposed to the atmosphere, a non-thermal chemical reaction occurs between the titanium tetrachloride and moisture in the air producing a smoke-like plume. The plume persists for 15 to 30 seconds depending on the moisture content of the air and the wind velocity. Subsection 3.4.1 of the EIS identifies titanium tetrachloride as an irritant to the skin, eyes, and mucous membranes. If a person were immediately adjacent to a cold-spot discharge, he or she could experience such irritation. However, since all persons are excluded from target impact areas when the range is in use, it would be impossible for any such exposure to occur. The small quantities of the substance in training ordnance and the byproducts produced are rapidly dispersed and neutralized. Quantities are insufficient to create even minor human health concerns or impacts to wildlife.

Only one defense Installation Restoration Program (IRP) project is located on the range. This site was used from 1976 to 1988 for annual burning and burial of spent munitions. Volatile organic compounds and semi-volatile organic compounds were detected in some samples. An IRP Feasibility Study for five sites (4 at Volk Field and one at Hardwood Range) was developed and has been recently (March 1998) released for public comment. A map of the site has been included in the FEIS.

No hazardous wastes are expected to be used on the range, however, an undated spill plan would be developed to include the range expansion area.

Response to Comment No. 5

The Ho-Chunk and Menominee Tribes have been contacted and issues relevant to Native American concerns have been discussed. The Tribes have indicated that further consultation would be necessary should the ANG acquire the land. The ANG currently has a coordination system in place with the Ho-Chunk Nation that provides for a 5 NM avoidance area during any of their special observances or ceremonies. This system is on an "as called for" basis and is implemented by NOTAM and direct communication with daily users. Correspondence associated with those coordination initiatives are presented in Appendix O to the Final EIS.

Response to Comment No. 6

Wood County's 4,031 acres of planted cranberries represent 26.5 percent of Wisconsin's 15,195 planted acres. The state-wide cranberry crop value exceeds \$143 million. Depending upon how the crop value is calculated for Wood County, it is estimated at approximately \$42 to 45 million.

Titanium and tetrachloride a poisonous gas is toxic to humans and animals, DEIS fails to address the toxicity. At the present time, no monitoring is being conducted on the existing site, yet a small plume of contaminated ground water was discovered in 1995. How much ground water will be contaminated with the expansion? What is proposed to deal with these contaminants? Shouldn't a solution be found to control this pollution?

Why haven't Ho-Chunk issues been addressed? Such as, A Memorandum Agreement and sites surveyed for sacred sites and artifacts?

The cranberry industry is very important to Wood County and the State of Wisconsin economically. How many dollars does the cranberry industry contribute? Studies have indicated cranberries are vital to good health and a preventative for certain ailments. On-going studies relating to heart disease are encouraging for the extended use of cranberries. Shouldn't we be preserving the wetlands to produce cranberries for these very reasons? Cranberries are unique to the cold climate wetlands, therefore, those lands can't be substituted. Cranberry production and wetlands wildlife co-habitate together with no adverse affects. Why hasn't the DEIS provided more information relating to cranberries as a health product?

Wood County Board unanimously opposes the range expansion. Doesn't Wood County Board represent the people? The question was presented to the military in regards to acquiring the county land by eminent domain, and was to have been addressed in the DEIS. Why wasn't it?

The landing strip is proposed to be developed on wetlands where a high water table exists. Where will the fill come from to fill in this land? What will be the cost to develop Hardwood as currently proposed? Why wasn't a comparison between a dollar savings and a dollar cost development figure given for this entire proposal in the DEIS? Other projects offer a realistic cost projection. The real costs for this project must be addressed. Taxpayers have a right to know what these costs will be.

Aren't accidents more frequent during take off and landings? How then can it be stated that mishaps would not be significantly altered by the proposed action?

RESPONSES TO COMMENTS

Response to Comment No. 7

Discussions of the health benefits of cranberries are beyond the scope of this EIS.

Response to Comment No. 8

Land acquisition through condemnation would have similar socioeconomic effects to the acquisition of land through voluntary purchase and sale. Both would be based on the appraised value of the property and in both cases, relocation costs would be paid by the Federal government, private lands would be taken off the tax rolls once they are owned by the Federal Government, and the operation and potential socioeconomic effects of the expanded range would be similar.

Response to Comment No. 9

The exact location or finalized requirement for a landing zone has not been determined. Therefore, any cost estimate would be premature at this time.

Response to Comment No. 10

As described in Subsection 3.3.3.1 of the EIS, the Class A mishap rates reflected in the document consider the life-time operational use of the aircraft, under all conditions of flight. Therefore, any mishap occurring during any phase of flight is reflected in the statistic. As discussed in the EIS, risks associated with aircraft mishaps is low.

A complete discussion of Class A mishap rates is contained in Subsection 3.3.3.1 of the EIS. Tabulation of statistical projections for Class A mishaps for each aircraft using the airspace associated with this proposal is presented in Subsections 3.3.3.1 and 4.3.3 for current and proposed use conditions, respectively.

RESPONSES TO COMMENTS

When an F-16 crashed in Strum, Wisconsin in June of 1995 it took three months and citizen contacts to Wisconsin senators to finally get the military to remove hazardous materials. How can we feel confident of efficient clean up in other incidents with a history like this? How will wetlands be affected if such an incident would occur and ground water is contaminated, especially if cleanup doesn't begin until several months after the accident?

11

When the DEIS concludes "no significant impacts" due to inadequate research, and some research has indicated potential problems, how can a conclusion like this be made without addressing the problem? Why isn't adequate research done to address the issue so an accurate conclusion can be made? How can a proposal such as this be developed with so many issues inadequately addressed or not addressed at all and be approved for development?

12

This concludes the request and questions I want addressed in the final EIS.

Thank you.

Sincerely,

Pauline Evans

Pauline Evans
RR1 Box 63
Viroqua, WI 54665

Response to Comment No. 11

The initial response to an aircraft accident focuses on rescue, evacuation, fire suppression, safety, and elimination of explosive devices, ensuring security of the area, and other actions immediately necessary to prevent loss of life or further property damage. Subsequently, the investigation phase is accomplished.

If an aircraft accident occurs on non-federal property, regardless of the agency initially responding to the situation, as soon as the situation is stabilized, a National Defense Area will normally be established around the accident scene, and the site will be secured for the investigation phase.

As soon as possible after all required investigative actions on the site are complete, the aircraft will be removed, and the base civil engineer will accomplish clean-up of the site, or will have a contract to an outside agency to accomplish the clean-up.

In the event of an aircraft mishap, the ANG puts the highest priority on human health and safety and any immediate threat to the environment. The ANG also takes complete responsibility for cleanup of all sites by working in close coordination with a wide range of Federal, state, and local officials.

Response to Comment No. 12

The research completed to support the preparation of the Hardwood Range EIS follows the use of various accepted scientific methodologies used to analyze pertinent potential impacts. These analyses have been prepared by qualified scientists and engineers who perform these services for a variety of customers, including the ANG. Copies of all material used in the preparation of the EIS is available on reserve at the Mauston, WI public library.

Written Comment Form

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE
HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

NOV 17 1997

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Bill Kibele III
TITLE/ORGANIZATION: Senior Airman US Air National Guard Madison
ADDRESS: 823 W 5th St Nebraska NE 68407
(Street) (City/State/Zip)

- COMMENTS -

I believe that the Hardwood expansion is essential. In a time of cutbacks with the active duty military, the guard is tasked more and more. Already in April 97, Madison went to Turkey. In Dec 97 Madison will go to Saudi Arabia to support the No Fly Zone. Our pilots need to be trained to be the best they can be. If this means losing a few thousand acres of land, so be it. Would you rather have your freedom with a properly trained military, or jeopardize that freedom for a few thousand acres. I like being free.

All these people that are opposed to the range expansion don't even care about the land. They're just anti-military. Most of them weren't complaining when Desert Storm was going on. Maybe now that Hussein is up to his old tricks, people will forget about the expansion and think about the important things. Like Being Free!

Will Ehlert

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

533

Please hand this form to the staff drop into the collection box or mail to:
Program Manager, Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEP
3500 Fletcher Avenue
Andrews AFB, MD 20762-5157

12210

B11

Katherine

Written Comment Form

NOV 17 1997

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Kris Kaberle

TITLE/ORGANIZATION: _____

ADDRESS: 818 So Section St Nebraska W. 54457
(Street) (City/State/Zip)

- COMMENTS -

I am writing this letter to say
I am 100% behind the Hardwood
Range expansion. I feel we have to
be prepared to defend our country or
one of our allies if the need
arises

Kris Kaberle
818 So Section
Nebraska W.
54457

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

534

Please hand this form to the staff, drop into the
collection box or mail to:
Program Manager, Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEV
3500 Fletcher Avenue
Andrews AFB, MD 20762-5157

123LO

Kris

Kaberle

Paul Westegaard
Wood County Parks and Forestry
Courthouse, 400 Market St.
P.O. Box 8095
Wisconsin Rapids, WI 54495-8095

NOV 17 1997

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Program Manager
Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fetchet Ave
Andrews AFB, MD 20762-5157

We are again stating our opposition to the expansion of the Hardwood bombing range. We have stated it many times over the years - at many meetings and in numerous letters. We are in agreement with all opposition from the County and other organizations opposed to this expansion. We see absolutely no benefit from the expansion, only many negative points which have been brought up and ignored by the Air Force. We feel the draft EIS was poorly done - grossly wrong - and a waste of time and money.

We have 255 acres in the proposed expansion -with 35 acres of cranberries already being harvested - 20 more acres being prepared for planting in the next year - and a potential for another 35 acres in the future. All of our sons are in the Cranberry industry as 5th generation cranberry growers - in Latvia, Canada, and here in Wisconsin. They have all helped with building this family operation from the start and we believe any or all of them or their children will continue our work.

We live in a fairly new home on the marsh, a necessity for its operation, and enjoy the wild life we see daily. Many ducks and birds call the marsh their home, as well as foxes, wolves, deer, and one great big huge bear I really don't want to see again. On walks along Batterman Road, we encounter many hunters and sightseers enjoying nature as it was meant to be enjoyed. To take all this away, from us and others - for reasons not clearly or correctly stated, does not seem logical. We believe everyone concerned with the expansion has been more than patient and understanding with the nuisance and noise we encounter so often, but enough is enough. Perhaps when this proposed expansion is again set aside, as we hope and it should be, we as taxpayers and residents of this beautiful area should take steps to have this whole operation moved so we and our families don't have to deal with this again.

Sincerely, *Clare & Charlotte Searles*
Charlotte Searles

Clare and Charlotte Searles
Jacob and Sharon,
Savannah, Stephanie, & Jacob
Corey and Kate

12410

Clare
Charlotte
Searles

535

Rt. 1 Box 1183
Readstown, WI

54652

17 November 1997

RESPONSES TO COMMENTS

Air National Guard Readiness Center
Program Manager, Handwood EIS
ANGRC/CEUP
3500 Fitch Avenue
Andrews Air Force Base, MD 20762-5157

SN:

The following is a partial response and objection to the draft EIS on the proposed expansion of the Handwood Bombing Range and its related airspace.

536 The ANG decision, "The southern and southwestern MTR corridors will not be carried forward for further study" is not a sufficient answer to the hundreds of letters written objecting to the DOPPA proposal for MTR's in my area. Also it is not an adequate written record of just what the "operational limitations for fighter aircraft" are in southwest Wisconsin.

Citizens from my area wrote detailed questions, expressing concern about very specific issues. The ANG promised it would study the issues and answer our questions.

Where are the studies?
Where are the answers?

Response to Comment No. 1

As a result of the public input through the scoping process associated with the Draft EIS, Air National Guard planners obtained information identifying the locations of potentially sensitive areas not previously identified during the DOPAA development process. Much of this public input focused on resources associated with the proposed new southern and southwestern MTR corridors. In consideration of potential environmental impacts to these locations (the Kickapoo Valley area as an example), it was immediately apparent that operational limitations on aircraft activities would need to be adopted for training scenarios in these areas. This determination subsequently led to the conclusion that the proposed southern and southwestern MTR corridors would not represent viable training opportunities that would justify the charting of the new low-level routes. Consequently, the proposals were dropped and plans to complete detailed environmental studies of the proposed new low-level MTR corridors were terminated and no studies were produced. The factors that influenced this decision for the proposed new MTR corridors were not applicable to the existing airspace associated with the range. Furthermore, in light of the operational limitations associated with the proposed new routes, the Air National Guard has no plans to pursue the establishment of the proposed southern and southwestern MTR corridors.

Witness 2.

RESPONSES TO COMMENTS

Where is the permanent written record of the decision-making process?

We want documentation of ANG studies and research up to the point at which it became clear that low-level flight corridors were inappropriate for southwestern Wisconsin.

If the record of ANG studies is not made public in a document such as the DEIS, the ANG will have effectively erased evidence of all the work the many active members of Citizens United did to support our claim that the MTRs would damage our lives, businesses, health, wildlife & livestock.

We don't want our work erased. It should be preserved in a public document so it could be retrieved in the future if the southern and southwestern MTR proposals were reintroduced.

On April 20, 1995, I wrote a 14 page letter expressing my concerns about the effects of the MTR's on my personal life and my farming operation. I sent my letter to the ANG via certified mail. -- I might just as well have burnt the letter because the "we are studying this" response I got back was an assortment of stock paragraphs which did not even apply to my questions.

Response to Comment No.2

The ANG cares about the people that live near their training areas and how they feel about the activity associated with training. The NEPA process is providing the ANG with an opportunity to hear exactly what the public feels about its proposal before any decisions are made. Every scoping comment and every comment on the draft EIS sent to the ANG has been read and incorporated into the administrative record for the proposal. Public comments have provided a better picture of what subjects the public wanted addressed in the document and have enabled the ANG to improve the EIS by focusing attention on specific issues for discussions in the EIS.

Witness 3

I want to see some evidence that someone in ANG has read my letter and tried to find answers to my questions. Since my concerns are equally valid for people living near Hardwood Bombing Range and under its "related airspace," I request that ANG discuss and answer my questions in the final EIS.

I also wrote two follow-up letters asking questions on temperature inversions and loss of selective breeding stock. These concerns also apply equally to residents of Vernon and Wood County. Where are the answers?

I repeat - my review of the DEIS convinces me that you have done little or no new work on old issues such as noise and have utterly failed to do any research on the possible adverse effects of flights and bombing on new areas of concern which were presented to you by the citizens of southwestern Wisconsin and Iowa.

Example "animals generally adapt and habituate" (DEIS 2-30)

This statement is an insulting response to concerns about livestock panic. We asked you to account for injuries, abortion, breeding problems, loss of prize breeding stock developed through years of selective breeding, loss of wool quality due to metabolic changes induced by fear etc, and

RESPONSES TO COMMENTS

Response to Comment No. 3

The scoping process is used to determine what issues are viable and relevant for inclusion in an EIS. EISs are not intended to be encyclopedic (see 40 CFR 1502.2 (a)). Temperature inversion and "loss of selective breeding stock" were not considered essential components of the EIS analyses.

Response to Comment No. 4

Studies on how people react to noise indicate that the important factors are how loud the sounds are, how long each sound lasts, how many times a day they occur, and what hour of the day they occur. To provide a means to evaluate the relative impacts of the noise from a particular activity, the noise measurement approach (the metric) must be a tool that can account for all these factors. The EIS uses for this purpose the widely used and accepted noise metric called the Day-Night Average Sound Level (abbreviated as DNL or Ldn) which allows noise from many different situations to be compared with each other.

Although Ldn is called an "average," it represents the total sound occurring within a 24-hour period, and is often described as a "cumulative" measure of impact. It has been shown to properly account for individual loud events of the type that may occur with military aircraft operations. However, while Ldn measures the total effect of all events, it does not describe the sound level for individual events. To address this, the EIS presents additional discussions of individual aircraft noise events and maximum sound levels that are useful to evaluate potential impacts.

Ldn still remains the primary noise metric for the assessment of potential impacts at various noise levels. Studies on noise impacts to communities have shown that to properly assess the impacts from a particular activity, it is important and useful to separate the way one individual may react to noise from the way the community, as a whole, reacts to this noise. Used in conjunction with an extensive existing body of research, the Ldn metric provides a means to accomplish this and to project a measure of the overall community reaction to aircraft noise levels associated with the aircraft operation studies in this EIS.

Wilmes 4

your answer is "they habituate" Where are the studies? Where is the data?

You should know that beef operations do not keep animals long enough to "habituate". Horses tend not to "habituate" until they're half dead.

"Habituate" is just one example of the many unsupported statements which infect the DEIS. You have had over two years to do research. You paid consultants have words like "science" and "engineering" in their company names. Where are your results?

Please conduct the studies you promised to do and include the data in the final EIS.

Sincerely,
Judith A. Wilmes

J. A. Wilmes
RT 1 Box 1182
Readstown, WI 54652

Copies to:

Senator Russ Feingold
Senator Herb Kohl
Congressman Ron Kind
F.A.A.

ANG Readiness Center
Program Manager, Hardwood EIS
ANGRC/CEUP
3500 Fetchet Avenue
Andrews Air Force Base, MD. 20762-5157

Rt. 1 Box 1183
Readstown, WI 5465
17 November 1997

RESPONSES TO COMMENTS

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Dear Sir:

I have reviewed the DEIS on the proposed expansion of the Hardwood Bombing Range and related air space, and I request that it be withdrawn immediately.

This DEIS is so premature, so poorly prepared, so unresponsive to the whole range of issues of ~~concern~~ concern raised by concerned citizens, that it should be withdrawn until the ANG and its contractors can produce a work worthy to be read and commented upon by the people of Wisconsin.

Incomplete, unfinished, never started, started late -- these statements accurately describe much of what masquerades as the substantive content of this DEIS.

"Absence of definitive data" and "few scientific studies" are phrases which plague this DEIS. Yet the ANG was supposed to obtain definitive data. Its contractors were supposed to do systematic studies.

The following is a quick example of what you

actually did:

ANG was asked about the effect of aircraft noise and vibrations on petroglyphs. Section F.2.9 of DEIS laments that there are "few scientific studies" but goes on to say that a restored plantation house was not damaged by aircraft noise.

This kind of clumsy, useless comparison exemplifies the poor quality work and the dislocated logic of the DEIS. And this is repeated over and over again on issues a lot more crucial than petroglyphs.

Life is short. I don't want to go on and on and on with criticisms of details in the DEIS. After all, I am not on full salary and benefits like ANG and its consulting firms.

You have presented an impressively fat document with little content. If you had overcome the public objections to the DOPPA by means of your superior data and your strong proofs, I would have been sorry, but I would not have been angry as I am today. ANG and whoever it hired to cut-and-paste together this DEIS has produced high-school stuff. At least the ANG could have spent my tax money better.

Request: withdraw Hardwood Bombing Range and related airspace DE until necessary research has been completed

Sincerely,
Judith Wilmes

J. A. Wilmes
RT 1 Box 1182
Readstown, WI 54652

Copies

Senator Russ Feingold
Senator Herb Kohl
Congressman Ron Kind
Secretary U.S. Air Force

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

November 18, 1997

Program Manager Hardwood EIS
3500 Fletcher Ave.
Andrews Air Force Base, MD 20762-5157

Dear Sir or Madame,

I request that the Air Force not condemn property in Wood County, Wisconsin. We are proud of our forests and natural beauty. The people of Wood County have spoken and do not want to sell their land. We do not want more of our land to be used for target practice. The land belongs to us all and the future generations who will inhabit the earth.

1

Sincerely,

Karen Banaszak
Not since
1144 Barkislett
Madison, WI

XC: Senator Russell Feingold
Senator Herbert Kohl

543

11-18-97

I am against THE HARDWOOD RANGE EXPANSION

THE DANGERS are AS FOLLOWS:

1. INCREASED Bombing FLIGHTS
2. PROBABILITY OF TRAINING ERROR FLIGHTS
3. MISDIRECTED Bombs
4. UNFORESEEN Air DISASTERS
5. SOUND LEVELS CAUSED By LOW LEVEL FLIGHT

OTHERS REASONS WHY I AM AGAINST HARDWOOD RANGE EXPANSION: ARE

1. TAKING OF PRIVATE LAND.
 - A. THREE LAND OWNERS ARE AFFECTED.
IT'S THEIR GOLDEN YEARS.
2. TAKING OF PUBLIC LAND
 - A. OVER 6,000 ACRES OF FORESTLAND FROM OUR COUNTY FOR TIMBER AND RECREATIONAL USES.
 - B. HUNTING, FISHING AND TRAPPING
3. WILDLIFE
 - A. THE EFFECTS IT WOULD HAVE ON NESTING, FEEDING, AND BREEDING HABITS
4. AGRICULTURE
 - A. WE NEED QUALITY AIR AND WATER TO GROW OUR GARDENS + CROPS
 - B. POLLUTION FROM THE PLANES AFFECTING OUR ENVIRONMENT.
5. NOISE
 - A. IT SCARES OUR GRANDCHILDREN, ANIMALS AND ME.
 - B. SO LOUD, IT AFFECTS MY HEARING.
6. TOWNS
 - A. LOSS OF COUNTY FOREST SEVERANCE TAX
 - B. LOSS OF STATE PAYMENT IN LIEU OF TAXES
 - C. TOWN ROADS CLOSED - LOSS OF TOWN ROAD AIDS.

IF THE GOVERNOR, SENATORS AND REPRESENTATIVES LIVED IN THIS AREA, WOULD THEY PERMIT THEIR LAND BE TAKEN,

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

544

1

Michio Benedict Benkowski
P.O. Box 32 5443
Bismarck, ND

12850

Benedict

Benkowski

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

November 18, 1997

Program Manager Hardwood EIS
3500 Fletcher Ave.
Andrews Air Force Base, MD 20762-5157

Dear Sir or Madame,

I request that the Air Force not condemn property in Wood County, Wisconsin. We are proud of our forests and natural beauty. The people of Wood County have spoken and do not want to sell their land. We do not want more of our land to be used for target practice. The land belongs to us all and the future generations who will inhabit the earth.

} 1

Sincerely,

Emma Czarapata

Emma Czarapata

XC: Senator Russell Feingold
Senator Herbert Kohl

545

NOV 18 1997

Written Comment Form

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Lori DeGayner

TITLE/ORGANIZATION: (private citizen)

ADDRESS: 350 W. Washington, # 220, Madison, WI 53703

Please send me a final draft of the ^(City/State/Zip) ^(Street) EIS. This is an official request

① There is simply no way you can cut down a forest, burn it & then drop bombs on it and not have an environmental impact.

② "The earth is a living, conscious being. In company with cultures of many different times and places, we name these things as sacred: air, fire, water, and earth."

Whether we see them as the breath, energy, blood, and body of the Mother, or as the blessed gifts of a Creator, or as symbols of the interconnected systems that sustain life, we know that nothing can live without them.

To call these things sacred is to say that they have a value beyond their usefulness to human ends that they themselves become the standards by which our acts, our economy, our laws, and our purposes must be judged. We can live the earth to appropriate them or profit from them at the expense of others. Any government that fails to protect them forfeits its legitimacy."

From the Declaration of the Four Sacred Things, by Winona

③ We don't need any more preparation for war. There are ways to resolve conflict peacefully.

Please hand this form to the staff, drop into the collection box, or mail to:
Program Manager, Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fletcher Avenue
Andrews AFB, MD 20762-5157

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

546

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C. G. Thomas, Congressman Ohio, Senator Kohl, Senator Feingold

Written Comment Form

NOV 18 1997

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

RESPONSES TO COMMENTS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Floyd A. Hohenstein

TITLE/ORGANIZATION: _____

ADDRESS: 332 Wood Ave Nekoosa, WI 54457
(Street) (City/State/Zip)

- COMMENTS -

I have submitted earlier comments at the Wisconsin public hearing. I have the following feelings.

As a property owner in the proposed expansion area, I believe my Constitutional and Civil Rights are being infringed upon. The right to own property and believe that item should be covered in detail in the final EIS. This property is proposed to be used for other than public use, which does not qualify in the 5th Amendment of the Constitution for shall as in the 5th Amendment of the Bill of Rights. The use is a far cry from public use.

Because one or two reserve personnel have a say in their limit to expand the range, you ~~will~~ expect the entire Wood County to suffer a loss, with many unhappy citizens. As well having less respect for that military to spend our dollars for a useless experience.

I don't see any WAFB aircraft around the U.S. George Washington. That's because your crafts are not stated.

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 2

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Please hand this form to the staff, drop into the collection box, or mail to:

Program Manager, Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fletcher Avenue
Andrews AFB, MD 20762-5157

13110

Floyd

Hohenstein

547

Nov 18, 1997

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

548 We the undersigned, oppose the expansion of the Hardwood Bombing Range in Wood County. There are no benefits for Wood County, yet there are serious negative impacts. We as taxpayers will sustain losses from any action that disintegrates our ability to attract, retain or expand existing business and industry.

Janet Olson 506 Nth Section St. Nekeasa, WI 5445
Dottie Uptad 18528 Hemminger Ct Nk
Janet Olson 1719 W. 1st St. Nekeasa, WI 5445
Denise Mene 4860 Lynn Hill Rd. Nekeasa, WI 5445

Christine Goodness 1194 Kimball Av Nekeasa, WI. 5445

Mary M. Olson 1684 E. 1st St. Nekeasa, WI 54457
Gloria Lynne 911 W. 3rd Nekeasa, WI 54457

Ruth Arenst 4395 Lynn Hill Rd. Nekeasa, WI 54457

Katrice Eglund 1368 Chy. Ind. B. Nekeasa, WI. 54457

Gregg. Plenski 4808 Lynn Hill Rd. Nekeasa, WI. 54457

Linda O'Donnell 5096 Cassinery Rd. Nekeasa, WI. 54457

(51 Nomenakers Club, Linda O'Donnell, Sec.)

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

November 18, 1997


Program Manager Hardwood EIS
3500 Fletcher Ave.
Andrews Air Force Base, MD 20762-5157

Dear Sir or Madame,

I request that the Air Force not condemn property in Wood County, Wisconsin. We are proud of our forests and natural beauty. The people of Wood County have spoken and do not want to sell their land. We do not want more of our land to be used for target practice. The land belongs to us all and the future generations who will inhabit the earth.

} 1

Sincerely,



XC: Senator Russell Feingold
Senator Herbert Kohl

Written Comment Form

NOV 18 1997

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: CLEMENT & LAVONNE RUESCH

TITLE/ORGANIZATION: LOCAL AREA CITIZENS

ADDRESS: 760 18TH AVE. SO. WISCONSIN RAPIDS, WI 54495
(Street) (City/State/Zip)

-- COMMENTS --

We are very much against any expansion of the Hardwood Bombing Range.

In addition to loss of good, productive land, County owned land, and of course, taxable base for local towns and counties, the impact of the unwanted noise of the large aircraft, for miles beyond the actual range acreage is prohibitive.

There are other wide open spaces in this County for this type of activity that would not interfere with the environment and the lives of many citizens in communities such as ours.

With respect for your position, and the good of all, we remain,

Sincerely,

Clement F. Ruesch
Lavonne E. Ruesch

Please hand this form to the staff, drop into the collection box, or mail to:

Program Manager, Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fitchel Avenue
Andrews AFB, MD 20762-5157

RESPONSES TO COMMENTS

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 2

The use of other training areas was examined as part of the development of the alternatives studies in the EIS and is given in Subsection 2.3.2. The proposal was designed to minimize conflicts with potentially sensitive areas while providing the training resources necessary to meet military readiness requirements. Because of limited fiscal resources and aeronautical constraints, virtually all of our nation's fighter units train in airspace that is within a "tank of gas" of the aircrews' home station.

Rt 1 Box 1183
READSTOWN, WI 54657
18 November 1995

RESPONSES TO COMMENTS

To: Program Manager, Hardwood EIS
Environmental Division
Air National Guard CEVP
3500 Fitch Avenue
Andrews AFB, MD 20762-5157

Subject: Why I oppose expansion of the Hardwood Bombing
Range. A personal perspective.

I am thankful that plans for low-level jet flights
over my area have been dropped, but since low-level
C130 flights will continue and, perhaps, increase, I
am now no better off than I was before the DOPPI
came out.

1. mid 1980's. I was repeatedly bothered by C130
pilots buzzing my house and silo. My
complaints got me nothing but lost time and a
big phone bill. (for details see my comments on
the DOPPI sent to you April 20, 1995).
2. mid 1990's. I worked long and hard with
Citizens United so my life wouldn't get any worse by
the addition of low-level jet flights to my C130 problems
3. Now. The draft EIS reveals that the ANG still has
no formal procedure for dealing with problems
or losses caused by low-flying aircraft of any
type.

Response to Comment No. 1

The ANG takes the public's concerns about pilot accountability very seriously. Any misconduct by a military pilot is a serious matter. If a member of the public is experiencing any problems with the military's operations in any of the airspace in the area that affects a person directly, the public affairs officer at the nearest military installation should be contacted immediately, or call (608) 245-4339.

The Federal Aviation Administration and each military service have very strict rules to ensure pilots stay within defined training airspace. The rules govern minimum altitudes, maximum speed, and type maneuvers that can be performed inside and outside designated training airspace. Military commanders have the authority to suspend pilots who willfully violate flight rules, such as flying outside designated training airspace. The military closely manages the airspace they use to ensure they do not exceed planned parameters.

Wilmes 2

In other words, the C130s which panicked my sheep flock and made my life miserable in the 1980's can still bother me. I can still waste my life calling around only to be told "they aren't our planes," "we don't know what they do when they leave base," "we try to be good neighbors" etc, etc. Nothing has changed.

Therefore, I oppose the expansion of Hardwood Range. In the absence of any sincere and bona fide process for resolving problems and for disciplining hot-dogging pilots, a larger range means more potential C130 flights, and more C130 flights mean that I will probably be worse off than I was in the 80's.

In support of my claim that ANG has arrogantly ignored legitimate complaints about low-level flights, please review item #13 of the letter sent by George E. Meyer, secretary, Wisconsin DNR to the ANG and a contractor for this DEIS. (DEIS... Hardwood Range Expansion... Appendix G, unpaginated) Mr. Meyer states, "A formal process for raising concerns and being assured of action to resolve is needed." He speaks of "years" of expressing DNR concerns "with little success in resolving the problems."

If ANG simply ignores the Wisconsin DNR, think how they can treat me or any other unfortunate individual. I believe I need protection from the ~~from~~ indifference and occasional bad behavior of the ANG.

RESPONSES TO COMMENTS

Response to Comment No. 2

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Wilmer 3.

I think this protection should be in the form of written rules and regulations establishing a formal process for resolving complaints. An 800# should be widely publicized, perhaps included in local telephone books (the new AVG 800# is not even listed in "information"). Finally an uncomplicated appeal process should be put in place.

Such measures could serve to reassure the many citizens who have been brushed off by the AVG. They will require that AVG really try to be the "good neighbor" it claims to be.

I request that provisions for resolving citizen problems with low level flights be included in the final EIS to help preserve the quality of life in Wisconsin.

Sincerely,

Judith Wilmer

RESPONSES TO COMMENTS

Response to Comment No. 3

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Written Comment Form

NOV 19 1997

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME Francis Gallagher
TITLE/ORGANIZATION: Paul Turner
ADDRESS 1912 Bonnie Lane, Frankish, Ill
(Street) (City/State/Zip)

- COMMENTS -

I own land up north & like to come up
to peace & quiet.
It don't need anymore airplanes flying
around all the times.
The airplanes almost break the windows
sometimes.

1

Please hand this form to the staff, drop into the collection box, or mail to:

Program Manager, Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fetchet Avenue
Andrews AFB, MD 20762-5157

RESPONSES TO COMMENTS

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Written Comment Form

NOV 19 1997

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

RESPONSES TO COMMENTS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Bill Kabele

TITLE/ORGANIZATION: Non Commissioned Officer in Charge, Hardwood Range

ADDRESS: 8188 Section St Nekosia Wn 54457
(Street) (City/State/Zip)

- COMMENTS -

This letter is in support of the Hardwood Range expansion. I have worked at Hardwood Range since 1981 and raised my family in Nekosia which is about ten miles from the range. I also plan to retire in Nekosia. We need this expansion. We are just too small for realistic training. We are limited in bringing the aircraft into the target area from one direction. Many times a month we will call an aircraft off beyond not let him drop because he isn't lined up with the right magnetic heading. This hant realistic training. We also need more room for a more realistic target array.

I'm also in support of this expansion as a local citizen. It seems like all the land in this area is becoming a cranberry marsh or a potato field. If the range gets this land it will not only benefit the range but also the local hunter and outlawsman.

If the military is not prepared to defend our freedom we may not have it to enjoy. The Hardwood Range ~~expansion~~ Expansion is a main goal to freedom.

Bill Kabele

Please hand this form to the staff, drop into the collection box or mail to:
Program Manager, Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEV
3500 Fletcher Avenue
Andrews AFB, MD 20762-5157

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Written Comment Form

NOV 19 1997

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

If you would prefer to submit written comments on the OEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Merlin Leschinsky & Kathryn Leschinsky
TITLE/ORGANIZATION: Landowner
ADDRESS: W7205 12th Ave Menasha, WI 54646
(Street) (City/State/Zip)

- COMMENTS -

We don't like the noise, we are retired & like peace & quiet. The noise disturbs the animals. The noise was so bad it almost broke our door windows.

1

RESPONSES TO COMMENTS

Response to Comment No. 1

Many citizens have expressed concern that their quality of life, which is based directly on the kind of lifestyle that they can enjoy while residing in or visiting the State of Wisconsin, will be changed by continued or expanded use of the Hardwood Range. The U.S. Air Force, including the ANG, has been conducting military aircraft operations at Hardwood Range for over 40 years. All of the military airspace assessed in the EIS is currently in use. Commercial aircraft overflights have also been taking place and will continue to do so. Citizens may notice changes in military aircraft overflights in certain areas associated with the Range. The number of sorties are proposed to increase in portions of the study area and decrease in others. However, existing quality of life in the study area should not be appreciably changed.

556

Please hand this form to the staff, drop into the collection box, or mail to:

Program Manager, Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fetchet Avenue
Andrews AFB, MD 20762-5157

13810

Merlin

Leschinsky

Timothy Otto
100 N. Minnesota Ave #7
Stevens Point, WI 54481

NOV 19 1997

RESPONSES TO COMMENTS

Response to Comment No. 1

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Response to Comment No. 2

Potential reductions in timber harvesting revenues and related manufacturing activity, changes in recreation access, and discussion of replacement lands is presented in Appendix I.

As of this publication, the Air National Guard has not received any proposals that could be construed as an approach to provide alternate lands that could replace lands lost if the Department of Defense approves the range acquisition, as outlined in Section 1. If the acquisition occurs, it is anticipated that a majority of the forest lands and agricultural uses would remain as they exist today. If the Department of Defense approves the acquisition, depending on how it is accomplished (i.e., fee simple purchase, leasing from owners or the State, license, etc.), replacement lands would be an action that the State of Wisconsin or Wood County could address, as appropriate.

Air National Guard Readiness Center
Program Manager, Hardwood Range EIS
ANGRC/CEVP
3500 Fetchet Ave
Andrews Air Force Base, MD 20762-5157

To whom it may concern:

I am writing in regards to the proposed expansion of the Hardwood Bombing Range of Juneau County into Wood County in Wisconsin. I am concerned that this expansion would not be beneficial to the area, nor is it desired by area residents. The effects of the range expansion are far-reaching and detrimental to the quality of life of the area residents. The effects are economic as well as environmental. I urge you as a concerned citizen to not expand the bombing range.

The proposed range expansion includes over 6000 acres of Wood County forestland. There are many people who depend on this for their livelihood. The forest produces thousands of cords of wood each year. There will be a job lost for every 28 cords of wood that is not harvested. The

RESPONSES TO COMMENTS

558

lost wood production will force hardships on many families and businesses. Consolidated Papers Inc. has stated that wood offered for sale from the range would not be likely to be bought. This is because of possible contamination from metal fragments or other foreign objects. The County Forest land also provides recreational opportunities for many people. Hunters and cross-country skiers are frequent users of the land. Money earned from county forestland is supposed to be reinvested in forestland. Where else is there 6000 acres of land available for the county to purchase in a single tract?

The proposed expansion area involves the unique farmland of cranberry bogs. Many families have built businesses based on this unique farmland. The cranberry bogs and associated wetlands provide habitat to many species of waterfowl and other animals. The proposed expansion area is also home to many other species of wildlife. The expansion would cause great harm to these species and their habitat. There is a wolf pack of 4-5 wolves in the Township of Remington

Response to Comment No. 3

Studies conducted on wildlife have shown that numerous wildlife species have the ability to adapt to the presence of man and various man-made sound sources, including jet aircraft noise. While the noise generated from low-altitude military overflights may be initially startling, habituation to jet aircraft noise occurs with most wildlife species. Species-specific responses to low-altitude overflights vary considerably, and responses from individual animals may have the potential to cause injury. However, wildlife populations are usually affected only when a variety of factors work in combination to impact them, including declines or fluctuations in the availability of a food source, habitat destruction or alteration, predation, hunting, trapping, poaching, disease, or inclement weather, rather than noise alone. Normally it would be unrealistic to predict or attribute any wildlife population declines to a single stressor, such as noise. In addition, no published scientific evidence was identified that indicated harm may occur to wildlife as a result of exposure to the levels of noise generated by military aircraft that would utilize the airspace associated with the Hardwood Range.

RESPONSES TO COMMENTS

559 near the expansion area. The expansion of the Hardwood Bombing Range will more than likely prevent the wolves from expanding their range. The range area is also home to the threatened Karner blue butterfly and wild lupine, its only known food source. The bombing range expansion will effect osprey, Blanding's turtles, reptiles like the Massasauga rattlesnake, and the living symbol of our freedom, Bald eagles. The increased air traffic associated with the range will interrupt migratory bird flight patterns.

There are costs that are not addressed in the EIS. What about the external costs associated with the project? The cost of rehabilitating the land after the range closes is not mentioned. The cost of maintaining the range after degradation is never mentioned. Soil erosion is a concern facing the expansion. The increased machine traffic can erode or compact the soil. Soil health is an effect that will face future generations.

I ask the Air National Guard to seriously reconsider your plans to expand the range. The expansion

Response to Comment No. 4

The ANG has been and will continue to work with the U.S. Fish and Wildlife Service, the Wisconsin Department of Natural Resources, and other regulatory agencies to exchange information and study the effects of their actions on threatened and endangered species within the areas affected by its operations. The ANG will continue this cooperative effort and adjust its operations should any information become available that would identify potential impacts on any threatened or endangered species or other wildlife.

Response to Comment No. 5

External costs such as closure of the range have not been computed because there are no plans, policies, or issues to close the range at this time or in the foreseeable future.

Response to Comment No. 6

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

will do far more economic harm
than good to the area economy.
It will cause environmental effects
that are detrimental to society's
well being. I ask that a careful
examination of the Environmental
Impact Statement be conducted.
Then, the Air National Guard will
also realize the negative impact
it will have.

Thank you,

Timothy Otto

Timothy Otto

NOV 19 1997

Written Comment Form

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Marty Wendt
TITLE/ORGANIZATION: St. 7163 Necedah, Wis
ADDRESS: _____
(Street) (City/State/Zip)

- COMMENTS -

I own land up north by Necedah
and don't like the noise & it disturbs
the animals & every body that lives around
here.

1

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Please hand this form to the staff, drop into the collection box, or mail to:

Program Manager, Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fetchet Avenue
Andrews AFB, MD. 20762-5157

Written Comment Form

NOV 19 1997

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

RESPONSES TO COMMENTS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: William H. Wolf
TITLE/ORGANIZATION: Just a local land owner
ADDRESS: 5137 Lynn Hill Rd. MeKeasick Wisc.
(Street) (City/State/Zip) 54457

- COMMENTS -

Dear Sir,
I'm sorry I didn't write to you sooner. It's a real part of my life. I put it off till the last minute. I went to the H. P. meeting, your house was had a few more out and have followed the comment to put mostly in the paper. Will quite frankly say though these comments seem to have people against the expansion. I don't believe this is the real case. At the meeting one of the notes was there were only 120 persons there. I didn't count heads but I think it a safe estimate. This compared to the ten of thousands that live in this area. Tell me we have a very small but vocal group that is against the expansion. The next thing that always goes up on comment and discussion in the paper is the noise pollution and the safety of children half to death. Sir if you would please just language this as please would do it. I have lived on this land I am completely with my 90 head of beef cattle and have raised 6 children. That once more and if my livestock ever looked up when that plane flew over.

Please hand this form to the staff, drop into the collection box, or mail to:

Program Manager, Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fetchet Avenue
Andrews AFB, MD 20782-5157

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No.2

It is possible that aircraft noise could startle domestic animals, especially young or penned animals, and cause them to injure themselves. However, animals adapt and habituate to various sound sources, including jet aircraft noise. Because the airspaces associated with the Hardwood Range are existing airspace that have been utilized for many years, this adaptation and habituation to jet aircraft noise has likely already occurred.

RESPONSES TO COMMENTS

And the only comment I had out of my children was "Wow look at that." It makes me think these kids that were second to death were probably insecure to begin with. I have lived here since 1972 and have enjoyed some of the finest hunting and fishing activities myself, my sons, and son-in-law and grandsons could ask for. Where these people get these environmental problems is beyond me.

It is probably inevitable that we will have an accident of some sort with the virtues that are flown. To that I can only say this. I have had uncles in the 2nd world war, cousins in the Korean war, cousins and one brother in Vietnam along with many friends, a niece in the Persian Gulf war. And if I and my wife have to watch sons and grandsons go to a crisis overseas at the whim of some Draft dodging president or congress person I want them over there with the most lethal, accurate air power possible for my children and all the children of other mothers and fathers everywhere in the U.S. This will probably come at the risk of air collisions at the range, but how else are we going to achieve this goal. I have 330 acres only about two miles from the present range and we stand some chance of the fall out should an accident occur but for the sake of the men and women in the armed forces the risk is worth the reward.

Response to Comment No.3

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

RESPONSES TO COMMENTS

Response to Comment No.4

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

564 There is one family that have a cranberry
marsh in this expansion area it would be
nice to consider them in future negotiations
that is the Clarence Seale family they do
have a lot to lose. There are also
revenue losses to the county that should
be considered, although I understand that's
minimal. The helicopter flight from
St Josephs hospital in Marshfield to Madison
or other hospitals I understand is on a pretty
good relationship with the range as you
should already know. And I suppose working
things out with the local cropshutters and
small airports in the area should be
addressed. But after these and maybe
a few other small problems are considered.
at least I for one have no problem with
the expansion

Sincerely

William H. Wolf

P.S

I would like an
EIS report or
summary

NOV 20 1997

Written Comment Form

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Larry & Vick
TITLE/ORGANIZATION: Land owner
ADDRESS: N13413 12th AV Medford, WI 54646
(Street) (City/State/Zip)

- COMMENTS -

I am (not) in favor of any more Expansion
of Hardwood Range because there is
too much noise pollution and water and air pollution.
They disturb the wildlife
They are always flying too low already so we are
don't need more of them in our area. They are disturbing
my Rabbits already, and Dogs.

1

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

565

Please hand this form to the staff, drop into the collection box, or mail to:

Program Manager, Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fitch Avenue
Andrews AFB, MD 20762-5157

(420)

Larry

Clark

NOV 20 1997

Written Comment Form

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME Alfred R. Johnson
TITLE/ORGANIZATION Land Owner
ADDRESS 2815 11th St. Macclish, Md. 54646
(Street) (City/State/Zip)

- COMMENTS -

I do not ~~because~~ want anymore Expansion
of Hardwood Range. Because of

- #1 Noise pollution
- #2 water pollution
- #3 air pollution
- #4 They disturb wildlife
- #5 Too many accidents and there will be more
- #6 They allow allways fly to base, no respect for
land owners and their animals.

There is just no reason to enlarge the Range.
with all I hear of other Camps and Ranges getting
closed up for lack of funds.

Please hand this form to the staff, drop into the
collection box, or mail to:

Program Manager, Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fetchet Avenue
Andrews AFB, MD. 20762-5157

RESPONSES TO COMMENTS

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

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1

NOV 20 1997

Written Comment Form

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Doris LaPalma + Keith LaPalma

TITLE/ORGANIZATION: Land owner

ADDRESS: 12 Ave, Macedon, Wis, 54646
(Street) (City/State/Zip)

- COMMENTS -

I am (against) enlarging the Hardwood Range.
They already make too much noise and pollute the
air. They disturb all the wildlife in the area.
They also already fly too low over here, they have
no respect for homeowners or the animals.

Please hand this form to the staff, drop into the collection box, or mail to:

Program Manager, Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fetchet Avenue
Andrews AFB, MD 20762-5157

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).



R.S. BRAZEAU, INC.
Glacial Lake Cranberries®

P.O. Box 903, Wisconsin Rapids, WI 54495-0903
(715) 887-4161 / Fax (715) 887-2090

COPY

November 21, 1997

Senator Herb Kohl
Senator Russ Feingold
U.S. Senate
Washington, D.C. 20510

Faxed: 608-264-5473
Faxed: 608-828-1203

Re: Hardwood Range Expansion

Dear Senators:

This letter is to help summarize the significant opposition to the Hardwood Range Expansion. The EIS blatantly disregards the original intent of existing laws and corresponding rules, e.g. County Forest Law, Wetland Protection, and Wildlife Management. This neglect makes our laws worthless and cultivates a total lack of trust in our government! A long range plan consolidating military facilities on already dedicated military and/or Federal lands would show prudent fiscal responsibility and environmental stewardship and would help restore faith in our government system!

It is unfathomable to think that the Air National Guard and the inevitable decisions makers could even consider expanding the Hardwood Range after we have heard and seen **unanimous opposition** from the Wood County Board of Supervisors, the Wisconsin Rapids Area Chamber of Commerce, the Marshfield Area Chamber of Commerce, the Ho-Chunk Nation, former Secretary of Defense Melvin Laird, the Wisconsin Wildlife Federation, the Central Labor Council of Wisconsin Rapids and Vicinity, the Wisconsin State Cranberry Growers Association, the Town of Cranmoor, the Common Council of the City of Wisconsin Rapids, Citizens Opposed to Range Expansion (CORE), Citizens United Against Low Level Flights, the Conservation Congress, South Wood County Airport, Central Wisconsin Regional Airport, St. Joseph's Hospital in Marshfield, and affected private landowners! This incomplete list represents most of Wood County! There has also been deep concern expressed for the impact on endangered and threatened species by the Natural Resources

RESPONSES TO COMMENTS

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 2

The ANG has been and will continue to work with the U.S. Fish and Wildlife Service, the Wisconsin Department of Natural Resources, and other regulatory agencies to exchange information and study the effects of their actions on threatened and endangered species within the areas affected by its operations. The ANG will continue this cooperative effort and adjust its operations should any information become available that would identify potential impacts on any threatened or endangered species or other wildlife.

145EO

Nacy

Proctor Brown

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Foundation of Wisconsin! What more evidence does the government need?

Many far reaching laws with greater impact on our daily homes and businesses are created without nearly as much input. This is significant! Citizens need to know that the democratic process works and that they can encourage responsible government. Efficient national defense, yes... Range expansion in Wood and Juneau County, NO! Please make a long term practical decision.

Sincerely,



Mary Brazeau Brown

cc: Program Manager, Hardwood EIS c/o Faxed: 301-836-8001
Environmental Division
Air National Guard CEVP
3500 Fetchet Avenue
Andrews AFB, MD 20762-5157



SIERRA CLUB - John Muir Chapter

222 S. Hamilton Street, Suite #1
Madison, WI 53703-3201

Tel: 608-256-0565
Fax: 608-256-4JMC

"TO SAVE THE EARTH IS A NECESSITY FOR EVERY NATION"
TOM BERRY

HARDWOOD RANGE EXPANSION DRAFT EIS

Program Manager, Hardwood EIS
Environmental Division
Air National Guard CEVP
3500 Fetcher Avenue
Andrews AFB, MD 20762-5157

November 21, 1997

Dear Sirs or Madam:

The John Muir Chapter (JMC) of the Sierra Club appreciates the opportunity to provide input into the Draft EIS document for the proposed Hardwood expansion, and provide the following recommendations and stances:

Recently, Chris Nehrbass and I visited the Hardwood Facility, and toured the proposed expansion area. We appreciate the courtesy extended to us by Capt. Jeff Moore and the other staff of the ANG. All of our questions were answered forthrightly and to the greatest extent possible.

Background

Currently, the world is undergoing a severe depletion of native, natural order, biological diversity, due to the extensive and intensive industrial logging of forests, resulting in the loss of sustainable biodiversity. The world is witnessing a massive human caused disruption of the natural order with the specific loss of tropical and temperate rainforests, boreal forests, hardwood forests, fragmentation of lands and waters, conversion of lands to agriculture and human habitations. This also emanates from air and water pollution, global warming, and other anthropogenic disturbances and activities. Nationally, congress is apparently unaware of the serious jeopardy our life support system is now in, and will be in the future.

RESPONSES TO COMMENTS

The impetus for this is making a livelihood and profits: economics. Seemingly, businesses forget their ethical and moral obligations in pursuing these ends. There can be no justice in business profits without justice for individuals, biodiversity, the earth and businesses too. These all must be satisfied concurrently to be ethical. (If market or legal conditions skew this endeavor toward destructive or severe competitive ends, then business should work to add protections to even the playing field). This applies to this military action also. The destruction of the biodiversity that literally creates the biological resources we live on is foolhardy. No amount of justification can redeem the terrible destruction humankind is inflicting on the earth. In this respect, please see the attached background document "Biodiversity as the Source of Biological Resources: A New Look at Biodiversity Values".

A disturbing development in this regard, and much of the impetus of this trend to destroy biodiversity, is economic globalization. This is "the expression of a corporate agenda to access ever more resources at ever lower costs". "Economic globalization has had the effect of stepping down on the accelerator, speeding us ever faster over the cliff of ecological collapse." According to "Ecological Sustainability loses out to Economic Globalization" by Victor Menotti, the solution is: "Citizens and their governments must recapture their democratic processes and institutions to reassert control over global corporations." Otherwise, without constraints, the trend is to allow corporate ownership and trade that overrides national and regional environmental laws and protections. The MAI (Multilateral Agreement on Investment) is another coming concern in this respect.

In this regard, the impetus to plunder the public and private biodiversity resources is seen as an attempt to cut costs. This applies to the Quincy Bill as much as to the Salvage Rider.

So what does the above have to do with the Hardwood Expansion? The JMC finds the proposed expansion of the Hardwood is unwarranted and is opposed for the following reasons: If the United States Dept. of Defense and the National Guard did not need this expanded bombing range to train during World War II, the Korean War, the Vietnam War, the Gulf War and other military actions, it should not need it now. The Draft EIS does not state why here, and why now, and why other locals will not fit the military training needs. Since we have no Cold War or any other war on the horizon, this expanded area is not needed. Also, the Iraq situation is containment.

Response to Comment No. 1

Many of the pilots that fought in these conflicts trained at the Hardwood Range, which has been operating for over 40 years.

Response to Comment No. 2

The use of other training areas was examined as part of the development of the alternatives studies in the EIS and is given in Subsection 2.3.2. The proposal was designed to minimize conflicts with potentially sensitive areas while providing the training resources necessary to meet military readiness requirements. Because of limited fiscal resources and aeronautical constraints, virtually all of our nation's fighter units train in airspace that is within a "tank of gas" of the aircrews' home station.

Also, we fail to see why the biodiversity of the Hardwood Range should be sacrificed for the training of foreign aircrews. According to Capt. David Olson, foreign crews will make up approximately one percent training at Hardwood. However, Capt. Olson further states that this is an approximation so perhaps this figure could be much higher.

3

The JMC sees this action as a land grab by the ANG. The JMC is concerned that the 600,000 acres requested for re-withdrawal being considered for a bombing range complex and used by the German Air Force out west is an additional loss to biodiversity. This is a loss of 300,000 acres now devoted to public use. To us, the issue is acreage being taken out of public use, here and in the nation. The Hardwood would restrict public use due to the bombing area per se. We request the ANG and Air Force use the bombing ranges they have now. We are also concerned with the relinquishing of 149,000 acres in Arizona and Nevada, to the BLM, where such acres will probably be devoted to grazing and suffer a great loss in biodiversity for this reason.

4

Will the German Government pay for the use of the Hardwood and how much? Why do they not train at home so as to save our biodiversity? In addition, the Dept of the Air Force, in their response of Nov. 17, 1997, did not answer all the questions in my letter of June 17, 1997. I requested to know how many acres in bombing range expansions "will be directly bombed and have their habitat altered or destroyed?", and this was not answered.

5

For this reason, the JMC requests to have in the EIS answers to the question of why this action is needed here and what are the compelling reasons nationally to expand this range?

6

In addition, the JMC finds itself in the position of opposing the relentless loss of biodiversity in this country and continent. We are no longer willing to accept the gradual downward slide in the loss of biodiversity from anthropocentric actions of any type. We find we are unwilling to settle for the gradual erosion of biodiversity, always in the name of some "progress" here, and some "progress" there. In this case, it is an unproven need for the ANG training and range expansion. Also, this expansion is without a real, true increase in native biodiversity elsewhere to make up for the loss here. The JMC is unwilling to buy the argument that a serious loss of biodiversity

7

RESPONSES TO COMMENTS

Response to Comment No. 3

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 4

This issue is beyond to scope of this EIS.

Response to Comment No. 5

Any requests for use of the Hardwood Range by foreign aircraft must be approved by the National Guard Bureau. Historically, units have not been charged to use the range. There are currently no plans to alter large areas of the proposed expansion for new targets if the decision is made to obtain the property. The targets will be relatively small and, using the existing range as a model, the disturbance for the actual tactical targets will probably be limited to less than 100 acres.

Response to Comment No. 6

The purpose and need for the proposed action are given in Subsections 1.2 and 1.3 of Volume I, respectively.

Response to Comment No. 7

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

is acceptable anywhere or for any reason. We are unwilling to accept the loss of biodiversity in the West, in the South, in the forests of Minnesota, or the County of Wood. We are unwilling to accept the lack of concern by some in congress, and the President, and uncaring concern for the environmental perspective by some. We are unwilling to accept the push by business to cut costs at the expense of our and our children's biological heritage and the biodiversity that produces the biological benefits we all need. Finally, we are unwilling to passively witness the daily steps taken backwards with concomitant loss of native biodiversity with but a token or very occasional single step foreword, in the quest to save biodiversity and the earth, from ourselves. Every loss of native biodiversity is a loss of a strand in the spider web of the earth's abundance and richness of life.

After reviewing every page of the Draft EIS, the JMC finds the proposed Hardwood expansion would result in a significant net loss of native biodiversity. Under these circumstances and without any mitigation, we are strictly opposed to the expansion. We find the net loss of biodiversity (see following comments) to be a great step backward, which further fragments this area, results in loss of habitat (for instance wetlands), and is morally therefore indefensible. This is not a practice of good stewardship or of the land ethic of Leopold. This land is not a commodity to use to help pilots learn how to fly. There are plenty of locations already in existence for this.

Additionally, the JMC calls for in-depth legislation to survey and study the National and North American Biodiversity (ecosystems are all connected) on all public lands, at spatial and temporal scales, and determine the means and needed protections, including legislation, to stop the net decline in native biodiversity and also reverse the decline. This will be a serious, massive undertaking involving the military, Forest Service, BLM, USFWS, EPA etc. The analysis should come up with recommendations for federal legislation and other means to stop the ongoing, gradual and not so gradual decline of biodiversity from a continental scale. It could ideally consider the means to stop the decline on a cross-land ownership scale also. This legislation and study is not a matter of politics but of the very survival of our species and the ecosystems we rely on for ecological services, recreation, clean water, evolution of species, etc. This study, with recommendations from a broad spectrum of scientists, theologians and social scientists, will serve to unite all persuasions of political beliefs, as there is an emergency need to act. Much like in World War II, where the nation faced an outside emergency and all the human and natural resources of the nation were brought to bear,

RESPONSES TO COMMENTS

Response to Comment No. 8

This issue is beyond the scope of this EIS.

we now face an emergency of attitude and orientation. In order to save our North American biodiversity and the species we share the earth with and depend on for our livelihoods and own survival, we must proceed as outlined above.

The purpose of the study and recommendations should be to produce: 1) recommendations for no net loss of native biodiversity on a watershed, regional, and continental scale and 2) recommendations and legislation for the reversal of the decline of biodiversity, and implementation of its restoration.

The need for this immense undertaking is that, as in the Hardwood case, we are looking at each site-specific action, and usually nature and native biodiversity are the losers. That is a criticism of this Draft EIS, that the document does not consider the affect of biodiversity on a watersheds basis, and does not consider how this action in combination with all other bombing range and base expansions affect biodiversity on a national level. Please do so in the EIS and let the citizens know of the alleged need for this expansion, and also the reasons why this action is not needed, as per NEPA.

We feel the national study must look at cumulative effects on a continental scale so as to come up with recommendations for biodiversity retention on a continental scale. We also request this EIS study the cumulative effects on a watershed basis and regional-state basis, tied in with the real need or lack of need for additional bombing ranges in the entire country.

The JMC expects there is a possibility that the Draft EIS may be purposely vague and evasive of hard data for a reason. The vagueness of the Draft EIS will lead to public comments calling for a more thorough and scientific approach, and then the final EIS may include such details without the public having the opportunity to examine this information, form enlightened conclusions and communicate their recommendations on such new information to the study itself and prior to the publication of the final EIS. As such, the JMC finds the ANG in violation of NEPA, 102(2)(C), 42 U.S.C. 4332(2)(C). The JMC feels there is not a real, forthright analysis and statement of alternatives of the proposed action. Without all the information available that the public needs to form an informed analysis on this action, based on all the relevant information, the Draft EIS is not fulfilling it's intended legal purpose. The CEQ states "It is not better documents but better decisions that count". How can the publics make informed decisions

RESPONSES TO COMMENTS

Response to Comment No. 9

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

based on an incomplete Draft EIS? The lack of information in the Draft EIS may necessitate a supplemental EIS. Please see EIS. 40 C.F.R.1502.9 (a) which states that a draft EIS should fulfill the requirements of a final EIS.

Again, the Draft EIS makes no attempt to outline how this expansion and "need" for action fits into the national arena of need for more and expanded bombing ranges. This analysis was even requested by the WI. DNR. We therefore request the development of new alternatives based on National Criteria and National Needs for each existing and proposed site around the nation, regarding the need for this ANG expansion. We request new alternatives and studies based on national environmental effects, direct and cumulative.

Consequently, the JMC finds that this action will reduce native biodiversity, otherwise known as pre-Columbian biodiversity, in Wood County and Juneau County, and is another incremental decline of biodiversity regionally and nationally. Therefore, this expansion is opposed and is not an ethical action. Under 40 C.F.R. 1502.14 the JMC requests the development of new studies and alternatives within the jurisdiction of the lead agency, the ANG.

Also, it is unclear where the Draft EIS identifies the preferred alternative in the Draft EIS, contrary to law (40 C.F.R. 1502.14 (e)). The JMC expects the "Final" EIS will explain and present forthrightly the environmentally preferred alternative, which has not been discussed in the Draft EIS. It is not sufficient for the ANG, the lead Agency, to merely describe in vague, nebulous ways, the affects of the action; it must also describe the environmentally preferred alternative, and if the EIS finds that biodiversity suffers from the proposed action, the JMC expects a conclusion from the ANG that the expansion is not appropriate.

The following comments of the JMC generally follow the sequence of the Draft EIS document itself:

The JMC finds the filling and draining of the expanded area may interfere with the hydrology of the area. It is not stated what affects this will have on the hydrology of the area and Other affects on biodiversity. For instance, what roads will be closed elsewhere on the facilities to offset the increased road construction of roads in the newly expanded area? What roads will be constructed? Where will they be constructed? Why are they not on a map in the DEIS to show the extensiveness of their impacts? The JMC cannot

RESPONSES TO COMMENTS

Response to Comment No. 10

Training for potential military conflict in time of peace is a reality recognized by the Congress and the President. As military forces are cut back, the quality of training for existing forces must be maintained and improved to ensure our nation has an effective military. As the active duty military force is reduced in size, the ANG role in the total force structure is increasing. Over the past several years, the DOD has conducted studies to evaluate mission readiness and cost effectiveness of its total force. In comparison to DOD regular components, the ANG has relatively low operating costs and provides a cost effective investment.

The use of other training areas was examined as part of the development of the alternatives studies in the EIS and is given in Subsection 2.3.2. The proposal was designed to minimize conflicts with potentially sensitive areas while providing the training resources necessary to meet military readiness requirements. Because of limited fiscal resources and aeronautical constraints, virtually all of our nation's fighter units train in airspace that is within a "tank of gas" of the aircrews' home station.

Response to Comment No. 11

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 12

The Proposed Action was identified as the Preferred Alternative in the Draft EIS in Subsection 1.5.2.3.

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RESPONSES TO COMMENTS

Response to Comment No. 13

Subsection 4.6.2 discusses potential impacts that could occur to both surface and groundwater resources. Construction activities and use of the target complex, landing zone, and drop zone could impact drainage patterns within the range expansion area because small diversions or drainages may need to be developed to route drainage around facilities. Localized changes in drainage patterns or routing drainage would not use water and would not affect water quantity in the region. Subsection 4.5.2.3 indicates that use of the tactical target complex and construction activities could increase soil erosion in localized areas, potentially causing impacts to water quality. These impacts would be mitigated and managed through the use of Best Management Practices (BMPs) to stabilize and minimize soil movement at the areas of disturbance. Potential sources of pollutants to surface and groundwater in the range expansion area are from aircraft mishaps (i.e. crashes) and from munitions. These sources and the fate of potential pollutants are discussed in Subsection 3.3.3.1 (Aircraft Mishaps), Subsection 3.3.4.1 (Munitions Use and Handling), and Subsection 3.4.1 (Hazardous Materials and Solid Waste). Based on this information adverse impacts to surface and groundwater quality or drinking water supplies would not be expected. Subsections 4.5.2.3 (Water Quality) were modified to reference the appropriate subsections in Section 3, and discuss conclusions regarding water quality.

RESPONSES TO COMMENTS**Response to Comment No. 14**

Background information discussing the geology and physiography of the area is provided in Subsection 3.5.1.1. This Subsection describes effects from the historic occurrence of the glacial lake, Lake Wisconsin, on the soils and geology of the area. Descriptions of groundwater resources in the area and baseline water quality are provided in Subsection 3.6.1.2. As discussed, the elevation of the shallow aquifer often raises above the ground surface level during periods of high precipitation, demonstrating that strong relationships exist between surface water and groundwater. Potential sources of pollutants to surface and groundwater in the range expansion area are from aircraft mishaps (i.e. crashes) and from munitions. These sources and the fate of potential pollutants are discussed in Subsection 3.3.3.1 (Aircraft Mishaps), Subsection 3.3.4.1 (Munitions Use and Handling), and Subsection 3.4.1 (Hazardous Materials and Solid Waste). Potential impacts to both surface and groundwater resources and water quality are discussed in Subsections 4.6.2.1, 4.6.2.2 and 4.6.2.3. Based on the information provided in Section 3, adverse impacts to surface and groundwater quality or drinking water supplies would not be expected. Subsection 4.5.2.3 (Water Quality) was modified to reference the identified appropriate sections in Section 3 and discuss conclusions regarding groundwater quality.

stress how inadequate this Draft EIS is from the standpoint of clearly illustrating the effects of each action and from the standpoint of backing up statements about no environmental damage or consequences with facts and research. For instance, again and again it is stated there are no negative effects but no data or studies are quoted to back up these allegations. The statements are vague and non-specific. For instance, what are the specific BMP's to be utilized (Page 2-29)? Should they be exceeded? If not why not? They should be! Where is the substantiation from other divisions of the federal government such as the EPA or the State of WI DNR, which provide evidence of the statement "No impacts to groundwater resources are expected to occur"? What is meant by the nebulous term "expected" here? Could they occur and what is the likelihood and probability of occurrence?

Another example: "Only a small increase in use, handling and generation of hazardous and solid waste materials is expected with the Proposed Action". No substantiation, no identification of what hazardous materials will be entered into the expanded ANG area, or what their properties are. This is not an adequate draft EIS. For instance, no mention of the following, which the JMC wishes to be answered: Where are munitions stored? How are out-of-date munitions disposed of? Are they disposed at open burn, or at open detonation sties, in case any unexploded ordinance are found? Are permits from the State or EPA to be obtained? What chemicals are involved in the munitions and any other activities by the ANG? Are any of them hazardous and how, or carcinogenic, and bio-accumulative to animals? How often are waste sites cleaned up and by whom? Who monitors the cleanups and how often? How deep is the ground water and is it contaminated? What are the results of the ground water studies? We wish to know as munitions contaminate water sources. Is white phosphorous involved which kills birds? What chemicals are in duds, target rounds, drop paint or powder and what are their hazards to humans and animals, and their bioaccumulative properties? Is chaff involved which can be ingested by wildlife? Is titanium Tetrachloride used? Will efforts be expended to kill birds due to aircraft safety and if so what species, when, where, how many and what effects will this have on bird biodiversity? Will habitat be altered or other actions employed to discourage animal or bird presence?

Also, how will habitat loss in the expanded area affect bird viability and reproduction? The EIS even admits a change in "plant community and physiognomy" but is silent on the exact changes or the exact extent of the

RESPONSES TO COMMENTS

Response to Comment No. 15

Subsection 3.6.1.2 indicates that in the range expansion area, the elevation of the shallow aquifer often raises above the ground surface level during periods of high precipitation, and shows that strong relationships exist between surface water and groundwater. These flooded conditions represent the worst-case scenario for evaluating potential impacts to surface and groundwater quality and were considered in this analysis.

See response to Comment No. 13.

Response to Comment No. 16

Coordination with Federal and State regulatory agencies have followed standard prescribed processes. Correspondence documenting that coordination is contained in this EIS.

Response to Comment No. 17

Potential sources of pollutants to surface and groundwater in the range expansion area are from aircraft mishaps (i.e., crashes) and from munitions. These sources and the fate of potential pollutants are discussed in Subsections 3.3.3.1 (Aircraft Mishaps), 3.3.4.1 (Munitions Use and Handling), and 3.4.1 (Hazardous Materials and Solid Waste). Potential impacts to both surface and groundwater resources and water quality are discussed in Subsections 4.6.2.1, 4.6.2.2, and 4.6.2.3. Based on the information provided in Section 3, adverse impacts to surface and groundwater quality for drinking water supplies would not be expected. Subsection 4.5.2.3 (Water Quality) was modified to reference the identified appropriate sections in Section 3 and discuss conclusions regarding groundwater quality.

Response to Comment No. 18

No hazardous waste would be generated in the proposed range. Old trucks used for targets would be drained of all fluids and the batteries removed prior to placement as a target. These materials would then be disposed of in a proper manner as a recyclable material or as a hazardous waste. Regardless, the spill plan would be updated to include the proposed range.

RESPONSES TO COMMENTS

Response to Comment No. 19

Expended ordnance is removed from the range at regular intervals. During collection, training ordnance is inspected to determine if a spotting charge may have malfunctioned and failed to detonate. If suspect, explosive ordnance disposal specialists render the ordnance safe using a small explosive charge. Then, all metal casings are collected and recycled as scrap metal.

The "cold spot" spotting charge used to aid scoring accuracy of training ordnance contains approximately 17 cubic centimeters (cc) of titanium tetrachloride. When exposed to the atmosphere, a non-thermal chemical reaction occurs between the titanium tetrachloride and moisture in the air producing a smoke-like plume. The plume persists for 15 to 30 seconds depending on the moisture content of the air and the wind velocity. Subsection 3.4.1 of the EIS identifies titanium tetrachloride as an irritant to the skin, eyes, and mucous membranes. If a person were immediately adjacent to a cold-spot discharge, he or she could experience such irritation. However, since all persons are excluded from target impact areas when the range is in use, it would be impossible for any such exposure to occur. The small quantities of the substance in training ordnance and the byproducts produced are rapidly dispersed and neutralized. Quantities are insufficient to create even minor human health concerns or impacts to wildlife.

Spotting cartridges contained in training ordnance contain a small quantity of gun powder, and those cartridges designated as "hot spots" contain a small quantity of red phosphorous. Gunpowder contains nitroglycerin and nitrocellulose. These materials are ignited and consumed upon impact of the training ordnance on the ground. Gunpowder combustion byproducts include carbon monoxide, carbon dioxide, and nitrogen oxides. The combustion of the gunpowder also ignites the red phosphorous, which burns rapidly and leaves no residue.

Response to Comment No. 20

Only one defense Installation Restoration Program (IRP) project is located on the range. This site was used from 1976 to 1988 for annual burning and burial of spent munitions. Volatile organic compounds and semi-volatile organic compounds were detected in some samples. An IRP Feasibility Study for five sites (4 at Volk Field and one at Hardwood Range) was developed and was released in March 1998 for public comment. A map of the sites has been included in the EIS.

RESPONSES TO COMMENTS

Response to Comment No. 21

Training ordnance components are discussed in Subsection 3.4.1. The gunpowder in the spotting charge contains nitroglycerin and nitrocellulose. These materials are ignited and consumed upon impact. Gunpowder either decomposes or is neutralized by explosive ordnance disposal personnel. Quantities are insufficient to create even minor human health concerns or impacts to wildlife. Waste products on the range are limited to steel and small quantities of aluminum from projectiles. These waste products are collected and recycled according to guidance for solid waste.

Response to Comment No. 22

Chaff consists of very small fibers of aluminum-coated mica that reflect radar signals and, when dispensed from an aircraft, form a cloud that temporarily hides the aircraft from radar detection. Although the chaff may be ejected from an aircraft using a small pyrotechnic charge, the chaff itself is not explosive. Chaff is composed of silicon dioxide fibers ranging in diameter from 0.7 to 1 mil (thousandth of an inch), coated by an aluminum alloy and a slip coating of stearic acid (fat). Analyses of the materials comprising chaff indicate that they are generally non-toxic in the quantities used. Silicon dioxide is an abundant compound in nature that is prevalent in soils, rocks, and sands. The trace quantities of metals included in the mica fibers are not present in sufficient quantities to pose a health risk. Aluminum is one of the most abundant metals in the earth's crust, water, and air. In general, aluminum is regarded as non-toxic. Trace quantities of silicon, iron, copper, manganese, magnesium, zinc, vanadium, or titanium may be found in the alloy. The quantities involved are a minuscule percentage of levels that might cause concern. Stearic acid is found naturally as a glyceride in animal fat and some vegetable oils. Chaff has also been test-fired in a controlled environment to determine its potential to break down into respirable particulates, and the findings of the test detected no such result. The potential for chaff to affect soil and water is remote. Laboratory tests of chaff, using a modified toxic characteristics leaching procedure, indicated little or no potential for adverse effects on soil. No adverse impacts on biological resources have been identified. Based on their digestive processes, few animals are expected to suffer physical effects from chaff ingestion. Effects from inhalation are not considered a significant issue, since chaff particles would represent a small percentage of the particulates regularly inhaled by animals. Impacts on land use and visual resources are directly related to the visibility and accumulation of chaff debris. Field studies of the visibility of chaff and incidental debris in different environmental contexts concluded that significant aesthetic effects are unlikely.

RESPONSES TO COMMENTS**Response to Comment No. 23**

See response to Comment No. 19.

Response to Comment No. 24

The ANG does not plan on killing birds as a part of this proposed action. Killing birds is not used as a safety precaution for military flights on a routine basis.

Response to Comment No. 25

As discussed in Subsection 2.6.1.3 of this EIS, the probability of a bird-aircraft strike is very low. No actions will be deliberately taken to discourage the presence of wildlife in the vicinity of the range. The same seasonally-adjusted bird avoidance procedures associated with known migration corridors as are currently utilized by aircraft in the area would be followed.

Response to Comment No. 26

The potential change in plant community and physiognomy that may occur due to the proposal would likely result in a concurrent change in avian community structure. This change would be related to the amount of habitat lost or converted to other habitat types, and would be manifested in a concomitant reduction or shift in the avian community. The plant communities present within the expansion area are relatively common in the region, and reduction or conversion of these habitat types under the proposed action would not represent a major impact to the avian resources of the area.

changes, and their cumulative effects (page 2-31) resulting from these changes.

2.6.2

What are the current road densities, what will be the width of the roads, what roads will be closed elsewhere to mitigate the increased roads? What roadless areas will be purchased elsewhere by the ANG to retain public ownership of unfragmented lands to counter the loss of these lands due to development? What are the affects of noise on reptiles, amphibians, mammals from the standpoint of the disruption of their life histories, reproduction, mating, raising of offspring, and their level of well being and contentedness? What is the affect of the noises from fear effect?

Affected Environment

The JMC disagrees the Affected Environment is only the air space in question and the immediate lands of the ANG expansion and present Hardwood. The affected lands are these and all the other lands in a regional perspective and their place in the immediate and greater landscape, from a landscape ecology standpoint. The EIS, to come up to the 1997 period, must address these issues.

3.1

Airspace is a finite resource, to be shared by commercial, general and military aviation needs, but what about the needs of birds, bats and insects? What affect will the expansion have on the biodiversity of the air and on bird numbers, bird migrations and bird access to the resources on the expansion area? Does the ANG intend to take mitigation measures during peak seasonal migrations of the birds? What affects will the flights of aircraft have on bird viability? As military use of the airspace in the expanded area will increase if the expansion goes thorough, will measures be taken to offset other flight levels if needed to protect the birds? In other words, will flights of aircraft be reduced elsewhere in the area, region to offset the increased noise and affects expected in the expansion area?

3.2 Noise: The DEIS is lacking in that it addresses noise level affects from an average perspective only. The JMC requests no approval of this expansion until adequate, credible scientific research is accumulated for measures of affects and noise on all type animals, cumulative and specific, and also including a fear response on the part of the animals, as opposed to a startle reflex.

RESPONSES TO COMMENTS

Response to Comment No. 27

Current operational characteristics of roads in the area of the range will not be affected by the proposed range expansion. Dirt roads currently exist in the range expansion area. Similar or existing dirt roads would be utilized for the operation of the range.

Response to Comment No. 28

The best available information indicates that the effects of aircraft overflights on wildlife and livestock are generally short-term and minor, with no mechanism for long-term effects such as reduced reproduction, increased mortality, or habitat abandonment. Noise impact studies from a variety of military use areas were considered in the impact analysis process. Please refer to Subsection 4.8.1.3 of this EIS for further discussion of noise impacts to wildlife.

Response to Comment No. 29

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

RESPONSES TO COMMENTS

Response to Comment No. 30

Because of the potential for loss of a pilot's life and the high cost of modern military aircraft, avoidance of collisions with birds is extremely important to the ANG. The potential for a bird-aircraft strike would not change significantly under this proposal. Training associated with the proposal will continue to encompass the same seasonally adjusted bird avoidance procedures associated with bird migration corridors as are utilized currently with the existing airspace. Due to the fact that bird strikes are rare in existing airspace associated with the Hardwood Range, the likelihood of future bird-aircraft strikes under any of the alternatives would be expected to be low.

The USAF has established a Bird/Aircraft Strike Hazard (BASH) Team to implement procedures to prevent and reduce the threat of bird/aircraft strikes, and to investigate and track any bird strikes that occur. In addition, each USAF/ANG base or flying unit is required to establish a BASH program to minimize the risk of bird strikes both at the base airfield and in airspace training routes for the unit. The USAF BASH Team assists each base or flying unit by providing Bird Avoidance Model (BAM) graphs. These graphs estimate the relative bird strike risk for flying along a specific low-level route or operations area. The model is developed on the basis of waterfowl and raptor migration and concentration data. The BAM graph depicts the severity of the bird strike hazard at a particular time of day, month, and segment of a low-level route. This information is used by the flying unit to determine the optimum route schedule and avoidance measures to be taken to prevent bird/aircraft strikes. In addition, the unit publishes Notices to Airmen (NOTAM) to alert transient aircrews to specific bird migration hazards, activity periods, and avoidance procedures.

Response to Comment No. 31

The procedures used to determine aircraft noise exposure and its results represent the best available technology. All aircraft operations presently occurring, and proposed to occur were considered. Noise was computed using the Air Force's MR_NMAP software, which bases its calculations on the same physical principles used for aircraft noise analysis throughout the world, and was specifically validated for military airspace operations. Data incorporated into the Air Force's noise models are widely accepted by the scientific community, and the Air Force regularly participates in various scientific organizations to ensure that the best available data and methods are used.

3.3 What chemicals are in the flares and spotting charges and what are their dangers to the plants, animals and water? Do animals ingest the flare ejection mechanism fragments? What affects would this have? Will the flare ejection fragments bioaccumulate over time? Do they affect the purity of the surface and ground water? Will water birds ingest them? What affect will the expansion and the firebreaks have on the structural and functional biodiversity of the area? Does the area contain interior forest conditions, which will be fragmented? What interior forests and wetlands will be purchased elsewhere for entry into the County Forest system for Wood County to offset the loss of these lands? We understand the townships do not want to devote their forestlands to the County Forest System so the loss of the Wood County Forest to the Hardwood would result in a loss of forest acres to the County Forest system. Are the casings picked up and if not, what are their biological hazards?

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An example of the inclusion of information but the revelation of nothing: 3.3.3.2: Birds are a safety concern. Birds can hit aircraft. The hazard is especially severe in bird migration routes. However, what will the expansion do to the birds, not what will the birds do to the aircraft (although this is a valid, legitimate concern). This is a DEIS, so the affects on birds is a real concern.

36

3.5: What affects will the noise and pollution in the MOAs have on the biodiversity below. In other words, the noise and pollution, startle and fear reactions affect animals such as wolves and deer, which in turn affect the vegetation.

37

3.6.1 The JMC requests consideration of the restoration of the total lands in the Hardwood and proposed expansion range. This would be by deleting the ditches where the affect on native biodiversity would not be severe or adverse, to bring this land back to where it was from a biodiversity standpoint prior to European historical times. This would be barrens, restored wetlands etc. The stream channelization and ditch construction would have to be reversed.

38

The destruction of the extensive wetlands in the Expanded area is totally opposed and the expansion should not proceed. It is a moral wrong to destroy so important a parcel of nature for this industrial military use.

RESPONSES TO COMMENTS

Response to Comment No. 32

The primary potential impact associated with flare use is the possibility of burning material reaching the ground and igniting a fire, which could create significant secondary environmental impacts. Minimum release altitudes established for flare release, and the complete cessation of flare use during periods of extreme fire risk minimize this risk. Toxicity is not a concern since magnesium, the primary material found in flares, is not highly toxic, and it is extremely unlikely that humans or animals would ingest flare material. Impulse cartridges and initiators used with some flares contain chromium and, in some cases, lead, which are hazardous air pollutants under the Clean Air Act. A screening health risk assessment concluded that they do not present a significant health risk in the quantities involved. Laboratory analyses of flare pellets and flare ash indicate that these materials have little potential for affecting soil or water resources. Field studies indicate that flare debris does not accumulate in noticeable quantities; therefore, there is little potential for impact to aesthetic resources.

See response to Comment No. 19.

Response to Comment No. 33

Because no more than 200 acres of vegetation would be disturbed under the Proposed Action, the effect on local and regional biodiversity would be considered negligible.

Response to Comment No. 34

As of this publication, the Air National Guard has not received any proposals that could be construed as an approach to provide alternate lands that could replace lands lost if the Department of Defense approves the range acquisition, as outlined in Section 1. If the acquisition occurs, it is anticipated that a majority of the forest lands and agricultural uses would remain as they exist today. If the Department of Defense approves the acquisition, depending on how it is accomplished (i.e., fee simple purchase, leasing from owners or the State, license, etc.), replacement lands would be an action that the State of Wisconsin or Wood County could address, as appropriate.

Response to Comment No. 35

Expended ordnance is removed from the range at regular intervals. During collection, training ordnance is inspected to determine if a spotting charge may have malfunctioned and failed to detonate. If suspect, explosive ordnance disposal specialists render the ordnance safe using a small explosive charge. Then, all metal casings are collected and recycled as scrap metal.

See response to Comment No. 19.

RESPONSES TO COMMENTS

Response to Comment No. 36

As discussed in Subsection 2.6.1.3 of this EIS, the probability of a bird-aircraft strike is very low, and therefore would not impact avian resources. The same seasonally-adjusted bird avoidance procedures associated with known migration corridors as are currently utilized by aircraft in the area would be followed.

Also, see response to Comment No. 33.

Response to Comment No. 37

See response to Comment No. 28.

Response to Comment No. 38

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

3.7 The use of lead ammunition from helicopters twice a year should be curtailed due to the possibility of birds ingesting lead into their systems, and due to ground contamination.

3.8 The DEIS does not deal with the certain critical role the tension zone plays and will play as a highly critical source of genetic material to seed the forest and biodiversity if global warming pushes the southern forest, northern forest and prairie in northerly, southerly or east-west directions. In this respect, the Hardwood should have no anthropogenic disturbance in the event the expansion does go through. If it does, and the JMC is opposed to the expansion, any forestry operations, and the Hardwood, must adhere to the following principles:

- 1) The managers must focus on what to leave, not on what to take. What to leave is a fully functioning ecosystem at all scales and through time.
- 2) Apply the precautionary principle to all the human actions on the existing Hardwood range and all Hardwood lands. Plans and activities must err on the side of protecting the ecosystem functioning, rather than erring on the side of protecting short term profits or timber cutting quotas.
- 3) Ensure that all plans and activities protect the forest-wetland-ecosystem functioning at all scales of time and space. Please embrace as large a landscape as possible, and look into the future hundreds of years rather than the next logging time.
- 4) Respect the ecological limits of various ecosystems to human disturbance. Consider the ecological limits of physical and biological factors in the plan actions, such as the shallow soil, high water table etc.
- 5) Ensure that all plans and activities protect, maintain, and where necessary, restore natural biological diversity. This includes on the Hardwood species, genetic and community diversity.
- 6) Respect and maintain natural disturbance regimes (fire, windthrow, insects and diseases) through time and space in order to maintain natural forest landscape patterns.
- 7) In the plan, and the JMC requests a new Plan for the ecosystem to be created under the principles of ecosystem management, all actions must protect, maintain, and restore natural composition, structures and functions at the stand and ecosystem levels
- 8) The Hardwood must diversity activities in the management of the ecosystem to encourage ecological, social and economic wellbeing and stability.

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RESPONSES TO COMMENTS

Response to Comment No. 39

As stated in Subsection 3.7.1 of the EIS, "lead is not addressed in this EIS because the only sources of lead emissions are small arms". Most small arms lead sources are from hunters using the area.

Response to Comment No. 40

Comment noted (see Section 6 in Volume 1 concerning incorporation of public comments).

- 9) The Hardwood must constantly review and evaluate the success of all ecosystem and timber management and other forest use activities in meeting the requirements of ecological responsibility.
- 10) The Hardwood must ensure that all the ecosystem use activities are compatible with and respect the First Nations' culture, both traditional and current, according to their own values.

(Thanks to Forest Voice, a Publication of the Native Forest Council, and the article "Ecoforestry: The Responsible Solution, by Herb Hammond of the Silva Forest Foundation).

RESPONSES TO COMMENTS

HARDWOOD DRAFT EIS-CONTINUED

The JMC requests in the restoration efforts of the ANG that prescribed fire be greatly expanded in the Hardwood area proper.

3.8.1.2 The fact that the flora and fauna have not been extensively surveyed renders the DEIS obsolete and redundant. This information should have been compiled before the DEIS. The alteration of habitat and the biodiversity, which will assuredly affect the viability of the 55 species of mammals, 17 species of reptiles, 12 species of amphibians, 246 species of birds, and countless thousands of species of fungi and other organisms, and also TES species, is not ethical and is opposed by the JMC at this time. Has the ANC contacted the USFWS and consulted with them on all federal endangered and threatened species as required by the ESA? This would include the Bald Eagle also. The DEIS states it is premature to do this which we conclude is in violation of NEPA.

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Response to Comment No. 41

Coordination with the USFWS is ongoing and will continue, as appropriate, prior to implementation of the proposal, as required by Section 7 of the Endangered Species Act.

I was informed there are wolves living on the ANG property and the expansion area. With wolf life history, though, this probably includes some of the time, or much of the time. This being the case, the expansion would constitute a take and the JMC is unalterably and adamantly opposed to the expansion for this reason. It is unethical to put the needs of the wolf and biodiversity below the needs of aircraft training at this time, without the threat of war. The real emergency is the loss of biodiversity throughout the nation. If the military is ecologically oriented, then the military should educate congress to this. A nation without biodiversity and sustainable ecosystems will be a poor nation and a poor nation will not be able to have a capable military.

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Response to Comment No. 42

Comment noted (see Section 6 in Volume 1 concerning incorporation of public comments).

As the Hardwood and proposed expanded area serve as a significant migratory corridor for wildlife and plant communities, the JMC is opposed to the expansion, as this function would be totally lost from the disturbances and conversion of habitat to human ends (if the expansion goes forward). Its proximity to numerous wildlife refuges, county forests, wildlife areas, community forests, state parks, state forests, state fish hatcheries, natural rivers, lakes and wetlands, and other public lands which serve to protect native biodiversity, renders this area very important as a corridor for

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Response to Comment No. 43

See response to Comment No. 26.

wildlife. The expansion would disrupt the ability of these ecologically beneficial lands to serve as biodiversity reservoirs and corridors. Therefore, the JMC is opposed to this expansion.

The bald eagle on page 3-61 is a threatened species.

4 Environmental Consequences

The JMC concludes the utilization of average noise events is totally irrelevant, as the human or animal responds to individual noises of high magnitude. Also, we find the accumulation of noises day in and day out for years is sufficient to impact the tranquility of the human and animal subjects. For instance, page 4-10, using an average duration of 30 seconds for events above 45 dB and 60 seconds for events above 65 dB, for an average of 7.5 minutes per day, is a total of 2737 minutes per year or 45 hours which is over 5 days of extreme noise. In 5 years, this would be 56 days of extreme noise. This certainly would have deleterious effects on not only the human recipients but also the helpless animal recipients from this human induced stress.

4.4 Although shells and projectile debris are removed periodically, are any shells and bombs left in the ground, as the frost may not always bring them to the surface? What are the results of the water and soil testing that are being or have been done at the present Hardwood?

4.6.2.4

The statement that "minor" impacts are expected to occur to earth resources as a result of the range expansion is untrue and unsubstantiated. The road construction and bulldozing will impose massive effects on the earth, wetlands and biodiversity in the judgement of the JMC. For instance, 207 acres of tree clearing and grading would occur in the drop zone; 43 acres on the landing area; and 2295 acres in the remaining expansion area, or a total of 2295 acres would be severely altered, bulldozed and destroyed of their life and biodiversity, and their capability to serve the needs of animals, now or in the future and perhaps forever. The DEIS has no basis for stating this is a "minor affect" and is contrary to NEPA regulations and requirements, as the statement is not explained or proven. The adverse impacts on wetlands on page 4-28, and the earth alterations above, are major, irreversible, direct and cumulative changes to the ecosystem, and as such the JMC finds the expansion is contrary to the public interest and the interest of preserving the life of the earth. The real needs of biodiversity will be undermined by this

RESPONSES TO COMMENTS

Response to Comment No. 44

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 45

Studies on how people react to noise indicate that the important factors are how loud the sounds are, how long each sound lasts, how many times a day they occur, and what hour of the day they occur. To provide a means to evaluate the relative impacts of the noise from a particular activity, the noise measurement approach (the metric) must be a tool that can account for all these factors. The EIS uses for this purpose the widely used and accepted noise metric called the Day-Night Average Sound Level (abbreviated as DNL or Ldn) which allows noise from many different situations to be compared with each other.

Although Ldn is called an "average," it represents the total sound occurring within a 24-hour period, and is often described as a "cumulative" measure of impact. It has been shown to properly account for individual loud events of the type that may occur with military aircraft operations. However, while Ldn measures the total effect of all events, it does not describe the sound level for individual events. To address this, the EIS presents additional discussions of individual aircraft noise events and maximum sound levels that are useful to evaluate potential impacts.

Ldn still remains the primary noise metric for the assessment of potential impacts at various noise levels. Studies on noise impacts to communities have shown that to properly assess the impacts from a particular activity, it is important and useful to separate the way one individual may react to noise from the way the community, as a whole, reacts to this noise. Used in conjunction with an extensive existing body of research, the Ldn metric provides a means to accomplish this and to project a measure of the overall community reaction to aircraft noise levels associated with the aircraft operation studies in this EIS.

Response to Comment No. 46

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 47

The possibility exists that inert ordnance remains on Hardwood Range. This ordnance would consist predominantly of steel and aluminum casing that would not leach into the groundwater system. The small quantities of spotting charge substance in training ordnance and the byproducts produced are insufficient to create even minor human health concerns or impacts to wildlife.

Response to Comment No. 48

The ANG firmly commits to not impact wetlands in development of the proposed expansion area; however, Executive Order 11990 which calls for "no net loss of wetlands" does not preclude the development of projects within a wetland as long as no practicable alternatives exist and that the proposal includes all practicable measures to avoid wetlands impacts. Assuming the expansion is approved, the proponent would be required to obtain an individual Clean Water Act Section 404 permit for any activities occurring within wetlands or other waters of the United States. Issuance of a Section 404 permit requires a demonstration that the Section 404 (b)(1) Guidelines have been followed. The Guidelines require that the project avoids and minimizes impacts to wetlands to the extent possible and provide mitigation for unavoidable impacts. Once specific designs and locations for the landing zone, drop zone, and target area(s) are available, the ANG will conduct jurisdictional wetland delineations to facilitate the assessment of specific project components (and alternatives) on wetland resources, as applicable. Subsection 4.6.2.4 of the EIS discusses requirements under Executive Order 11990, Protection of Wetlands, Section 404 of the Clean Water Act, and Chapter NR 299 of the Wisconsin Administrative Code.

As indicated in Subsection 4.7.2.1, although specific site development plans have not been developed for facilities in the range expansion area, some estimates can be made for land and tree clearing requirements. To reduce potential costs, the landing zone will most likely be located on an existing roadway with an additional area (approximately 100 total acres) added on either side for wing clearance. The landing zone area will be used as the drop zone. There are currently no plans to remove trees and alter large areas in the proposed expansion area for new target locations, because enough clearings and roads currently exist to meet most requirements. The targets will be relatively small and, using the existing range as a model, the disturbance for the actual tactical targets will probably be limited to less than 100 acres. This would bring the total area disturbed under the proposal for land and tree clearing to approximately 200 acres.

Subsection 4.5.2.3 indicates that use of the tactical target complex could increase soil erosion in small localized areas caused by dropping target munitions, potentially causing impacts to water quality. All impacts to soils would be mitigated and managed through the use of Best Management Practices (BMPs) to stabilize and minimize soil movement at the areas of

expansion, and if biodiversity suffers, the needs of humans may not be served down the road due to the loss of the very biodiversity which produces the biological resources which we all depend on. 4.6.4 The Hardwood expansion will have NO impacts to water resources if it does not proceed. The "unavoidable impacts" referred to are avoidable if the expansion plan is stopped.

4.7.3.6 The DEIS tends to concentrate its analysis on the effects of the action to humans in the entire document. The DEIS should equally concentrate on the effects to biodiversity and animals-plants. That the air quality will deteriorate due to low-level flights is admitted in the DEIS. Whether this is in compliance with EPA is immaterial to the health of the animals, as their tolerances may be different. Also, the EPA standards are maximum thresholds, and therefore the deterioration of the air quality will be unfortunate and significant to humans and animals, in the judgement of the JMC, at the levels below the EPA maximum thresholds.

4.8.1.1 The JMC disagrees this is a question of whether the impacts are adverse to principally TES species. It is important to us to ascertain the effects of this action to ALL SPECIES.

4.8.1.3 The effects from noise must consider research from fear reactions. If this research is not available, the action should not go forward as significant effects are unknown and the DEIS must consider all significant effects. The JMC believes that although the results of the scientific studies are mixed in the DEIS, the preponderance of the evidence is clear, that raptors, water birds, large mammals, bats, reptiles and amphibians suffer severely from the adverse increased noise and the fear effects induced from the noise, and the expansion should therefore not proceed.

4.8.2.1 The logic of the paragraph beginning "Indirect impacts..." page 4-46 is flawed. For the writer to conclude that "This level of impact seems minimal" because of adjacent forests that are undeveloped with similar plants and species, and that the Hardwood Bombing area is small in comparison to the area, and that the plants are not scarce, is unreasonable and without merit. The significant acreage involved is large, and every loss of biodiversity is significant. This action is many steps backward for native biodiversity, these acres are not expendable, and all the life here is important and precious! The "loss of small amounts of vegetation" page 4-49 is not a "small" amount, and is a great loss, and is terribly important to the

RESPONSES TO COMMENTS

disturbance.

Response to Comment No. 49

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 50

Studies conducted on wildlife have shown that numerous wildlife species have the ability to adapt to the presence of man and various man-made sound sources, including jet aircraft noise. While the noise generated from low-altitude military overflights may be initially startling, habituation to jet aircraft noise occurs with most wildlife species. Species-specific responses to low-altitude overflights vary considerably, and responses from individual animals may have the potential to cause injury. However, wildlife populations are usually affected only when a variety of factors work in combination to impact them, including declines or fluctuations in the availability of a food source, habitat destruction or alteration, predation, hunting, trapping, poaching, disease, or inclement weather, rather than noise alone. Normally it would be unrealistic to predict or attribute any wildlife population declines to a single stressor, such as noise. In addition, no published scientific evidence was identified that indicated harm may occur to wildlife as a result of exposure to the levels of noise generated by military aircraft that would utilize the airspace associated with the Hardwood Range.

Response to Comment No. 51

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

biological-ecological integrity of the area and the animals that live here! We are talking about the life support systems of these animals and ecosystems being destroyed! This is hardly an insignificant topic to them when the bulldozers start bulldozing their homes.

In conclusion, the JMC finds the expansion area contains irreplaceable, special and biodiversity rich ecosystems and plant communities with sensitive soil. These special places will be destroyed or severely and irreversibly altered, and the effect of this will be to impact adjoining public and private lands and the biodiversity within and adjacent to all these places. The NEPA analysis of cumulative and direct effects is not adequate because it does not deal adequately with local, regional or national effects. The mitigations are not adequate because there is no mitigation which can make up for the destruction of land and its life on it. As required by NEPA, mitigations to protect the unique fauna and flora on the expanded area are not even dealt with as required by NEPA, or they are totally inadequately dealt with in the DEIS. The noise analysis assumes the effects on certain species, but not all species, and assumes the discussion to be adequate from the standpoint of startle effects, when in fact the effects are from a fear or terror reflex, which imposes a much greater physiological effect on the organisms, including children. The JMC feels these facts make the FONSI now or in the final EIS flawed, and the decision now or in the final EIS to proceed with this expansion is consequently flawed, and unethical for the reasons stated above..

Sincerely,


Tom Herschelman

Biodiversity-Forestry Chair John Muir Chapter Sierra Club
W3238 Woodland Rd
Sheboygan Falls, WI 53085

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RESPONSES TO COMMENTS

Col. Adams,

As a citizen of Wisconsin, I vehemently
oppose the expansion of the bombing range
into 6,000 acres of wood county forest.
State Statute 2811 protects public forests
for future generations. If the military
condemns the forest land in order to proceed
it would be a clear violation of states'
rights. Leave our forest land at rest!

1

Sincerely,
Peg LaMartina
Rt 2 Box 69
Chap Mills, WI 54631

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).



November 21, 1997

Program Manager, Hardwood EIS
Environmental Division
Air National Guard CEVP
3500 Fetcher Avenue
Andrews Air Force Base, MD 20762-5157

To Whom It May Concern:

These comments are presented on behalf of the Wisconsin State Cranberry Growers Association (WSCGA). Our organization was founded in 1887 to represent Wisconsin's cranberry farmers. Today the Association represents 131 cranberry growing companies and 85% of the planted acreage in the state. Cranberries are Wisconsin's largest fruit crop and the state leads the country in cranberry production, growing more than 40% of the nation's crop. The area just north of the proposed expansion is the largest inland producing area of cranberries in the world.

Overall, the draft document is inadequate. The format used is cumbersome to review. The overall size is impressive but the document is lacking in its thoroughness and quality in reviewing the proposal. Very little information is available on the current state of the environment of the existing range. This information is necessary to assess the impact of the expansion.

The proposed expansion would have direct impacts on our members in that at least one cranberry farm is in the acquisition area. Additionally, many farms border on the proposed new range. We have reviewed the draft EIS and find it lacking in addressing the impacts of the proposed expansion on not only our growers but also on the overall environment in Wood County. Our concerns can be summarized as follows:

- Very little, if any, consideration was given to alternatives on land already owned in title by the Federal and State Governments and especially the Department of Defense. It makes little sense for the military to acquire over 7,000 acres of private and county forest land when there are other vast holdings of land by the government in the immediate area. The EIS needs to document the environmental impacts of these alternatives.
- The EIS fails to address the taking of private lands and negative impacts on the quality of life of those who live and work around the range. Until these issues are adequately addressed we remain strongly opposed to proposal.
- The models used to assess noise pollution and impacts in the area are seriously flawed. The analysis should focus on the actual levels of noise during operations and not an overall average over time. an appropriate analysis would show that these levels are unacceptable.
- There is no resolution of the issue of the replacement by the county of the lost forest land. If the county seeks to replace the land lost by the expansion (as it will need to do according to state law) this will have serious impacts on property taxes for county residents. The EIS needs to address this issue.
- Removing an irreplaceable, 6,000 acre tract of multi use public forest land has a significant negative effect on the environment and recreational opportunities for not only residents of the area but those

RESPONSES TO COMMENTS

Response to Comment No. 1

The Air National Guard has no jurisdiction to acquire lands presently under the administration of another Federal agency. Lands such as the Necedah National Wildlife Refuge already have a specific mission in their own right and therefore represent an extremely undesirable alternative to fulfill the need express by the Proposed Action.

Response to Comment No. 2

Many citizens have expressed concern that their quality of life, which is based directly on the kind of lifestyle that they can enjoy while residing in or visiting the State of Wisconsin, will be changed by continued or expanded use of the Hardwood Range. The U.S. Air Force, including the ANG, has been conducting military aircraft operations at Hardwood Range for over 40 years. All of the military airspace assessed in the EIS is currently in use. Commercial aircraft overflights have also been taking place and will continue to do so. Citizens may notice changes in military aircraft overflights in certain areas associated with the Range. The number of sorties are proposed to increase in portions of the study area and decrease in others. However, existing quality of life in the study area should not be appreciably changed.

Response to Comment No. 3

The approach used to provide noise analyses in the EIS has been specifically tailored to analyses of military aircraft operations. The Federal Interagency Committee on Noise (FICON), representing a variety of Federal agencies with a mix of concerns associated with aircraft noise, reviewed aircraft noise analyses issues in 1992. The committee's report (FICON 1992) continued an approach to evaluating relative impacts associated with aircraft noise that has been recognized by noise analysis experts as the most widely endorsed and comprehensive approach to aircraft noise analysis available. This approach to noise analysis was incorporated into the analyses associated with the Draft EIS. In general, Federal land use compatibility criteria are derivatives of guidelines first devised for land near airports. All land use compatibility is based on the use of Day-Night Average Sound Level (abbreviated as DNL or Ldn) as the descriptor representing community noise environments. The criteria treat areas below DNL 65 dB as compatible for all uses, including residential, and they treat DNL 65 dB as a threshold for significant exposure. There is no generally accepted method for treating rural areas differently for these purposes.

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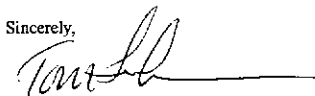
Lochner

that travel to the area to enjoy the high quality opportunities that currently exist. To say that deer hunting will be allowed during the 10 day gun season is an anemic substitute for the current opportunities available.

- The military has less than a stellar environmental record in the management and operations of their facilities. What steps will be taken to prevent a degradation of what is now a pristine area in Central Wisconsin?
- The proposed expansion area is a diverse, multi use forest. Replacing it with a bombing range can only result in environmental degradation that is unacceptable to the public.
- The EIS does not address the impacts that the expansion would have on the day to day farming activities of our members. For example there have been instances of "near misses" between military aircraft and aerial applicators working cranberry marshes. How will these safety issues be addressed?

We want to again state that we are opposed to the proposed expansion of the range. Our opposition is based on the unanswered questions that we have. We have always supported a well trained military and believe that those in uniform, committed to the protection of our country, should receive the necessary support and resources. In this instance we believe that there needs to be further study of the resources already available.

Sincerely,



Tom Lochner
Executive Director

cc: Senator Herb Kohl Rep. Martin Schnieder
 Senator Russ Feingold Senator Kevin Shibilski
 Representative David Obey Paul Westgaard
 WSCGA Board of Directors WSCGA Governmental Relations Committee

RESPONSES TO COMMENTS

Response to Comment No. 4

As of this publication, the Air National Guard has not received any proposals that could be construed as an approach to provide alternate lands that could replace lands lost if the Department of Defense approves the range acquisition, as outlined in Section 1. If the acquisition occurs, it is anticipated that a majority of the forest lands and agricultural uses would remain as they exist today. If the Department of Defense approves the acquisition, depending on how it is accomplished (i.e., fee simple purchase, leasing from owners or the State, license, etc.), replacement lands would be an action that the State of Wisconsin or Wood County could address, as appropriate.

Response to Comment No. 5

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 6

The ANG takes the public's concerns about pilot accountability very seriously. Any misconduct by a military pilot is a serious matter. If a member of the public is experiencing any problems with the military's operations in any of the airspace in the area that affects a person directly, the public affairs officer at the nearest military installation should be contacted immediately, or call (608) 245-4339.

The Federal Aviation Administration and each military service have very strict rules to ensure pilots stay within defined training airspace. The rules govern minimum altitudes, maximum speed, and type maneuvers that can be performed inside and outside designated training airspace. Military commanders have the authority to suspend pilots who willfully violate flight rules, such as flying outside designated training airspace. The military closely manages the airspace they use to ensure they do not exceed planned parameters.

Written Comment Form

NOV 21 1997

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Ralph Plantikow
TITLE/ORGANIZATION: Owner
ADDRESS: Business
Janeville, Wis. Janeville, Wis. 53545
(Street) (City/State/Zip)

- COMMENTS -

I can't understand why this range is closed. It has to be enlarged. It seems to be sufficient for the time being.

It also seems odd that you would close some bases, then turn around and make this one bigger. Isn't it possible to use one of those that's been terminated?

If you lived near this range which I have over, bases less than 9 miles away, F-16's can be heard for miles.

I suppose it's going to be expanded whether we like it or not. The people that live around the present range are not.

It isn't that much concern for me. As it is for those people that live less than a mile or two away. In other words I have concern for others.

Have you thought about what enlarging this will do to the environment. If it is damaged in such a way that it can't be cleaned up. Until Christ comes back and shows us how to do it. The last book of the Bible tells that it will take 7 years to bury the dead, and cleanse the land. I can assure you that this is going to happen.

My signature is above,
Think about this.

Please hand this form to the staff, drop into the collection box, or mail to:

Program Manager, Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fitch Avenue
Andrews AFB, MD 20762-5157

RESPONSES TO COMMENTS

Response to Comment No. 1

Closures proposed and accomplished by the DOD take into account possible re-use by any military component for military training or readiness reasons. If any of the closures had any purpose or function that would support this proposal (range expansion), it would have been identified and the ANG directed to examine its viability. To this point, identified closure activities and locations do not fit the need as stated in this EIS.

Response to Comment No. 2

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Barb Schieffer
**AMERICAN HERITAGE
LOG CABINS, LTD.**

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Hillsboro, Wisconsin 54634
(608) 528-4433



RESPONSES TO COMMENTS

To Whom It May Concern:

NOV 9 1 1997 11-97

After reading the Draft EIS, I have come to the conclusion that the expansion of the bombing range is not a good idea. The impact on the environment is too great and the potential negative effects on human and animal health are not worth it.

It seems that the military has forgotten what its purpose is. It is a department of the government that was given the role of protecting U.S. citizens. Instead of this, more and more it seems to be threatening the very people it is meant to defend. The military is one of the major contributors to pollution in our country and has impacted many people's drinking water and air quality so adversely to the point of nonrecovery for many decades.

If we no longer are able to enjoy the basic necessities of life in this once pristine and beautiful land, what's to defend? Sick people? Extinct animals? A devastated landscape? It seems like the military has gone too far and needs to be pulled back in. It has become too aggressive and willing to bully anyone who gets in its way, even citizens of the United States.

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

This country is not a playground for a military that has lost its sense of spiritual purpose. Encouraging its soldiers to bomb land that serves as habitat for endangered species, that provides homes and livelihood for people and that is country forest land, is immoral. Especially when there are simulated computer programs that will give them training.

As a tax paying citizen, I would like to see the government, who is working for me, be more conscious of the effects of its actions in the long term. Too often short term decisions have been made in the name of defense, when the underlying motives have actually been greed, power and/or fear. A strong defense to me means taking care of this beautiful land we've been allowed to live on; being caretakers, not abusers of the precious natural resources, and respecting other living things all around us. We will be a strong country again once we put love before fear.

In closing, again I would like to emphasize that the expansion of the bombing range is a step in the wrong direction. The military needs to clean up the mess they've made in the area instead of making more. So far, their record of cleanup is not good. They should not be exempt from pollution controls and environmental regulations. They owe it to the people to protect us by keeping our waters clean and our air fresh.

Since there are so many sensitive environmental areas in the bombing region - for nesting birds, etc; and since there would be a great impact on wetlands & other surface waters; and since the soil would be eroded and groundwater discharge & recharge and flood storage characteristics would be affected; etc, etc., etc. There is only one answer here. NO EXPANSION OF THE BOMBING RANGE! Think up! Sincerely, Grant Schaffer

RESPONSES TO COMMENTS

Response to Comment No.2

The ANG has been and will continue to work with the U.S. Fish and Wildlife Service, the Wisconsin Department of Natural Resources, and other regulatory agencies to exchange information and study the effects of their actions on threatened and endangered species within the areas affected by its operations. The ANG will continue this cooperative effort and adjust its operations should any information become available that would identify potential impacts on any threatened or endangered species.

Response to Comment No.3

The use of flight simulators for pilot training is already part of the training program for various aircraft using the affected airspace. The F-16 training regulation (AFI 11-F16) stipulates those activities that may be accomplished using simulators and those requiring actual flying. Although flight simulators work well for certain types of training (e.g., emergency procedures and instrument training), the complete substitution of simulator training for all flight training is not a viable alternative. In addition, the availability of simulators for on-going readiness training is limited.

Response to Comment No.4

Comment noted [see Section 6 in Volume I concerning incorporation of public comments].

Andrew & Miriam Simons
2705 Spring Valley Road
Boscobel, Wisconsin 53805
608/375-5200
Fax:375-4626

November 21, 1997

Lt. Col. Kent Adams
Hardwood EIS
Environmental Division
ANRGC/CEVP
3500 Fetchet Ave.
Andrews AFB, Maryland 20762-5157

Dear Lt. Col. Adams,

Thank you for the opportunity to comment on the proposed expansion of the hardwood bombing range.

Please consider expanding facilities in less populated and more environmentally barren areas. In peacetime there is no excuse for using an area so full of human activity and wildlife habitat. In addition to local residents the area to be included in the bombing range is PRIME recreational land for over 12 million citizens from Minneapolis/St.Paul, Chicago, Milwaukee, and the thousands of towns and cities within driving distance.

The additional cost and flight time required to shuttle pilots to the West or to ocean ranges is very small when fairly compared to the loss to be incurred on the ground in Wisconsin. Please consider that under the current proposal the training of a very few number of pilots will cause aggravation, loss and disruption to MILLIONS.

Thank you for your consideration.

RESPONSES TO COMMENTS

Response to Comment No. 1

The use of other training areas was examined as part of the development of the alternatives studies in the EIS and is given in Subsection 2.3.2. The proposal was designed to minimize conflicts with potentially sensitive areas while providing the training resources necessary to meet military readiness requirements. Because of limited fiscal resources and aeronautical constraints, virtually all of our nation's fighter units train in airspace that is within a "tank of gas" of the aircrews' home station.

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Written Comment Form

NOV 21 1997

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Elleanor J. Wargawsky

TITLE/ORGANIZATION: Land owner

ADDRESS: N12953 12th ave. Necedah WI 54646
(Street) (City/State/Zip)

- COMMENTS -

I am opposed to the Hardwood Range Expansion. I have seen the disturbance to animals, and heard the noise, TV interference. These are the known effects and the unknown may be even worse. I am afraid of the toxic pollution that can hurt plants and animals, maybe even humans.

I know people who are always coughing and have phlegm build up with sore nose and throat. This could be caused by the titanium tetrachloride. So please stop the air runs and certainly do not increase them.

RESPONSES TO COMMENTS

Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Please hand this form to the staff, drop into the collection box, or mail to:

Program Manager, Hardwood EIS
Environmental Division
Air National Guard Readiness Center/CEVP
3500 Fetchat Avenue
Andrews AFB, MD 20782-5157

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Elleanor

Wargawsky